

Review of the Higher Education Provider Category Standards

SUBMISSION

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

- The need to have the title “university” protected by legislation is a very important requirement to ensure that the quality of delivery of tertiary education is the highest possible. However, “quality” is not established or maintained by limiting the number of institutions able to access to this descriptor. Limiting the number of institutions able to use this title does not, of itself, necessarily produce better outcomes. We need a more education-output focused way of determining which institutions can use this term, even if this leads to an increase in the number.
- The key focus of the current Review should be on establishing criteria based on the quality of education delivery, not the type of education delivery (knowledge- or curriculum-based) and its connection to research outputs.
- It is important to acknowledge that the protection afforded by legislative / regulatory control is to create benefits for stakeholders of the focal institutions, not only benefits for the institutions themselves. The Review must demonstrate that whatever characteristics are settled on leads to sustained improvement in outcomes of all forms for students, graduates, industry and society. If the current distinction, based on research outputs, is maintained then the Review must be able to demonstrate how this benefits these and other stakeholders.
- Not all tertiary educational or training institutions should be able to call themselves a “university”, simply by virtue of the fact that it focusses on post-secondary education. The title “university” should be limited to those institutions where the primary purpose of the institution is to deliver a rounded, comprehensive educational experience for its students from AQF Level 5-10 (as compared with a singular, limited, short-term training activity). This comprehensive experience must include community service obligations, a true learning environment that extends within the institution but beyond the classroom, appropriately designed and managed programs and delivery demonstrably based on the scholarship of engagement (in the Boyer, 1996 sense of the term and as developed by Glassick, Huber, and Maeroff, (1997) and Williams, Goulding, and Seddon, (2013)).
- “Scholarship”, the traditional essential characteristic of a university, has been hijacked by the term “Research” in post-war universities. It is a commitment to scholarship that must again become the defining characteristic of an Australian University in the Twenty First Century, not the production of research outputs (usually measured in terms of publications).

- The difference between the two primary categories (HEP and University) should be based upon the demonstrable ability of the institution to undertake sustained, high quality educational governance of programs underpinned by scholarship (including self accreditation) from AQF Level 5-10, rather than simply whether it undertakes research or not. This “ability” should be assessed through appropriately rigorous external reviews every 8-10 years. All who have achieved the status of “university’ must be reviewed / audited in this manner. It should not be assumed that the current public universities can continue to retain their title simply because of their historical position.
- There will, of course, continue to be a distinction between institutions based on demonstrated research output. This should become to be seen as simply a reflection of a different strategic intent of the institution, rather than a defining characteristic. That is, some organisations that merit the title “university” because of their ability to demonstrate high quality educational governance underpinned by scholarship, may chose to devote a significant proportion of their resources to the pursuit of certain forms of research, presumably based on their belief that the nexus between research and teaching results in the best quality outputs for their students (as opposed to a desire to retain a particular title). Others who also demonstrate high quality educational governance may believe that quality outcomes for students and society come from a lesser focus on certain forms of research and a greater emphasis on other inputs to the educational experience, including for example “applied research” that is not judged by formal publications.
- If the differences between universities are seen in terms of this distinction (rather than whether they engage in research or not) then students may soon begin to base their choice of institution on the quality of the program they want to undertake rather than whether it is run by a “university’ in the current usage of the term. This may have the desirable effect where all institutions compete for students on the quality of their programs and educational outputs, thereby focusing more on that quality than publication outputs.
- The end result of this suggestion may be that those institutions that choose to focus on research may at the same time start to focus more on post-graduate programs, where the nexus between research and teaching quality is probably more capable of being demonstrated, especially in those programs that include research. A good example of this is the changes that occurred in the University of Melbourne a few years ago.
- As a corollary, those institutions which don’t focus on the same level of research will not need to cross-subsidize research activity from teaching income and may be able to devote a larger proportion of their teaching income to improving teaching and learning (e.g. better staff : student ratios, etc.).

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

- The current distinction between HEPs and Universities is exploited in marketing, in a society that perceives the latter type of institution as being inherently better. Implicit in this is almost a suggestion that universities provide “higher education” while others provide “lower education”. The perception is that institutions without university status deliver lesser quality programs rather than different programs of the same quality.
- It is generally accepted that we need greater diversity in universities (Davis, 2017). An academic or knowledge-based approach to tertiary education is not appropriate for all, even those with the capability to successfully complete that form of education.
- All the current categories with the title “university” are essentially the same. This was the major thesis of Davis (2017) who suggests that all Australian universities follow a very similar model. When Minister Dawkins brought the CAE and University sectors together in 1989, the hope was that this would lead to increased diversity of delivery. Unfortunately, this created uniformity, as new entrants aped the incumbents in an attempt to be seen as equals on the incumbent’s terms. Most of the current categories of “university” in the PCS are simply variations on a theme (either by size, stage in development, or location of the ‘head office’). Any change to the PCS must promote diversity.
- Changes in the PCS must create institutions with the same status as a university even though they emphasize different forms of education. This should include knowledge-based education, capability-based education and competency-based education, practice-based education, to name a few.
- The best example of the latter point is the Victorian College of the Arts which runs courses that are highly practical in nature, courses that are described as “practice-based” but which could equally be described as competency-based (in the broadest sense of the term). This once stand-alone institution can at this point in time only have the status of a “university” because it is part of a larger organisation that itself meets the strict research criteria that currently exists.
- This diversity must not be encumbered by institutional nomenclature that reinforces stereotypes regarding what constitutes the highest form of learning with different forms being relegated to other categories or being forced to be housed within a larger institutional framework.
- The latter descriptions of forms of education may raise alarm amongst traditional university devotees. However, the last few decades have demonstrated that different educational theories and approaches can result in equally high quality learning outcomes. The route may be different, but the outcomes are at least equivalent and possibly may be even a better fit for purpose.

- Given the status that is held by institutions with the title “university” in society these days, a change in this will help to ensure that the full range of approaches to Tertiary Education will be seen as acceptable by students, parents, employers and the broader society.
- Society has, for a variety of reasons, placed institutions with the title “university” on a pedestal with the result that many young people enrol in those institutions even though it may not be appropriate to their needs or desired learning outcomes.

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

- There should be only three categories: Australian University; HEP and Overseas University.
- The category **Australian University** should be based on the quality of educational governance as described above, not the number of teaching areas nor the emphasis placed on research. This category may itself be subdivided into sub-categories that reflect the educational philosophy or approach (for example Melbourne Technological University; xxxxx Vocational University; xxxx Research University; xxxx Practice-based University; etc).
- The category **HEP** is retained for those institutions who do not meet the quality of educational governance based on scholarship expected of a university but are still deemed capable of delivering externally regulated programs for AQF Levels 5 and above or do not offer programs from AQF 5-10.
- The category **Overseas University** is retained for those who meet the educational governance standards required of a university here in Australia but which have their headquarters overseas.
- The category University of Specialization should be removed because the quality of the educational delivery and governance is not determined by the number of fields of knowledge that an institution works in. It is more about the quality of the outputs and the benefits derived for stakeholders. The fact that there is only one of these in Australia is indicative of its limited value.
- The category of University College should also be abolished as this is inherently designed to reduce rather than increase diversity. As a ‘transitional’ category, it appears to be designed to give institutions time to become more like their current university cousins than to create new and interesting forms of quality education.

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

- As mentioned above, the primary focus of this submission is to call for a revision to the category **Australian University**. The primary argument is that the right to use the title “university” in an institutional title (or to be recognized as having “university status”) must not be dependent upon the existence of a research profile, unless that institutional professes research learning outcomes. Rather, it should be retained for those institutions that can demonstrate the highest quality of higher educational governance based on scholarship as judged through a very rigorous on-going process driven by the regulator. This has a number of consequences:

- That institutions that see their purpose as primarily research organisations rather than to develop graduates with research skills and knowledge would not be able to use the title “university” (eg. Baker Institute);
- That institutions that meet the regulator’s higher educational governance standards based on scholarship and undertake research as part of the teaching – learning – research nexus continue to use the title “university”; and
- That institutions that meet the regulator’s higher educational governance standards based on scholarship, but which do not have a high level of traditional research output, be allowed to use the title “university”.

- Institutions given the right to use the title “university” should have the right to add a descriptor to that title to accurately reflect the educational approach that they adopt. Examples of this could include, but are not limited to:

- Melbourne Applied University
- XXXX Research University
- XXXX Vocational University
- XXXX Technological University
- Etc.

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

- **Providers** would be able to compete on a more level playing field where the distinguishing features revolve around educational quality, not perceived status based on research outputs. Of course, those institutions that adopt a strategic position where they continue to emphasize research outputs would not be discouraged or penalized. Rather, they would be competing for students on the basis of their belief that this is a positive feature for potential students. The market and broader society (rather than the regulations) will determine whether they are right in this belief.

- **Students** would benefit from the diversity of choice that would open up to them in a context where the pressure to attend a limited number of “prestigious” institutions (by virtue of their title) will be less than their desire to achieve certain personal outcomes. They will be able to make real choices, free from societal pressure.
- **Industry** will benefit by ensuring that there are a range of institutions that are of equal status that deliver programs that they believe are appropriate to their needs. This would address the current calls for a change away from the knowledge-based curriculum being the only high level form of educational outcome. They will be able to choose from graduates of a diverse but equally high quality form of educational program. Industry is, of course, extremely diverse and its recruitment is driven by a desire to have the highest quality staff. How different industries and organisations define high quality will vary and the availability of a diversity of applicants, all having achieved an acceptable standard in a quality institution (as acknowledged by its title), would be to their benefit. Institutions, recognized for their hands-on approach to higher education at university standard, may be seen by some in industry as producing graduates that are exactly what they are seeking. Others, of course, may continue to recruit graduates from those institutions that educate in a context where the research-teaching nexus continues. Industry will benefit from this choice.
- **Regulators** will not necessarily benefit as they will have to develop extremely rigorous processes to evaluate the quality of educational governance every 5-10 years. This is acknowledged as very difficult but essential.
- **The broader public interest** will benefit from a tertiary education system that is based on quality of opportunity for all, where personal educational success is not equated with one form of intelligence and having graduated from one educational paradigm. The focus will be on levels of attainment measured through the Australian Qualifications Framework that reflect the relative complexity and/or depth of achievement and the autonomy required to demonstrate that achievement, whether that is achieved through the traditional knowledge-based route or not.

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