

SUBMISSION TO THE REVIEW OF THE HIGHER EDUCATION PROVIDER CATEGORY STANDARDS

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Holmesglen Institute

About Holmesglen

Holmesglen has a proud 36-year history of delivering quality education and training. We have developed from a specialist provider for the building, construction and ceramics industry to one of Australia's largest TAFE institutes offering senior-secondary, vocational and higher education programs. We operate from eight campuses at six locations including Chadstone, Glen Waverley, Moorabbin, Central Melbourne, and North Melbourne, as well as our rural learning centre in north-east Victoria, numerous workplaces Australia-wide, international project postings and off-shore partner institutions. In 2018 we recorded over 28,000 enrolments across our three sectors of delivery – senior-secondary, VET and Higher Education. We are also the primary destination for international students studying at a TAFE institute in Victoria, with over 4,000 students making the journey to study at Holmesglen. In 2018, we delivered 15 bachelor degrees and four post graduate programs. Of these, one was delivered under third party arrangements with an Australian university. Holmesglen's Centre for Applied Research and Innovation was established in 2017. This Centre reflects Holmesglen's commitment to ongoing dialogue and collaboration with industry and community through support for learner and staff researchers.

Introduction

Holmesglen Institute welcomes the opportunity to submit to the Higher Education Standards Panel Review of the Higher Education Provider Category Standards (PCS). Whilst this review considers an important aspect of the tertiary landscape, it is narrow in that it does not cover the myriad of challenges providers have to address to innovate and remain relevant and responsive to the social and economic needs that education serves. As highlighted in the Review of the Higher Education Provider Category Discussion Paper, (2018), 'the higher education sector will need to continue to innovate in order to respond to emerging needs and challenges brought about by globalisation, international mobility, technological advancements, demographic shifts, the changing nature of work, continued massification of higher education and increasing competition in higher education'. Amongst the needs and issues emerging from the work-education nexus is the need for higher technical skills, with shorter, and more flexible paraprofessional qualifications that focus on skill sets and applied knowledge.

In the context of these challenges and changes, a broader conversation is needed to discuss the tertiary system as a whole, and not just provider categories. Nevertheless, the Review of the Higher Education Category Standards provides a timely opportunity to address an important aspect of the technological, social, and economic challenges facing Higher Education Providers (HEPs) and their stakeholders, and remains a critical step in addressing the Institute's long-held belief that the current PCS require revision, given the growing diversity of the higher education sector.

The PCS are not reflective of the diversity of the higher education sector

The current PCS have remained unchanged for well over a decade. Over this period, the higher education (HE) sector has changed significantly, including in terms of access and equity of participation, and number and diversity of providers. In response to these changes, most countries in the OECD have created diversity of institutional type in their tertiary sector. In contrast, the current Australian provider categories only enable limited diversity.

While the 'University' categories in PCS are differentiated, including by area of specialisation and domestic or international provider, there is no such distinction available for Non-University Higher Education Providers (NUHEPs). All NUHEPs – whether they are new or mature providers – are grouped together in the one undifferentiated category of 'Higher Education Providers' (HEPs). This grouping of all NUHEPs in a single category fails to accord consideration to specialisation, excellence, maturity, reputation or risk, as recognised in the *Review of Higher Education Provider Category Standards Discussion Paper (2018)*. Furthermore, when NUHEPs are categorised together, broad minimum requirements rather than differentiation and excellence, become the focus.

As highlighted in the University of Melbourne's 2018 Scoping Study to inform the Review of Higher Education Provider Category Standards paper, it is important that there is "careful design for categorisation schemes as they have a significant function in providing information to students and communities, as well as a role in supporting institutional differentiation".

It can be argued that many NUHEPs, including Holmesglen, are clearly fulfilling a unique role, serving distinct cohorts with distinct approaches to teaching and learning that differ from others within the HEP category that we currently occupy. The current PCS leave NUHEPs with no scope for progression or differentiation if they do not aspire to become a university.

The 'University College' category, as it stands, is intended specifically and exclusively as a transitional status. As such, it does not accommodate NUHEPs that aspire to move to a category that is representative of their diversity and level of maturity. It is noteworthy that whilst the term 'University College' (or its equivalent) is used in a number of higher educational systems throughout the world, it is not used as a transitional category in these countries.

In Holmesglen's view, the PCS should accommodate NUHEPs that aspire to move to a category that is representative of their diversity and level of maturity, and do not aspire to become a university. This would benefit stakeholders through:

- providing prospective students with valuable and transparent information (in addition to that currently available on QILT¹ and admission transparency data) about the provider's history and track record, thereby enabling students to make an informed choice.
- having clearly defined criteria for risk assessment and re-registration for both providers and the regulator.

¹ QILT – Quality Indicators for Learning and Teaching

Proposed revision to the Australian University College category

Holmesglen proposes that the PCS category 'Australian University College' is retained but the requirement that this is a provisional category for institutions with plans to become an Australian University or Australian University of Specialisation is removed. Providers in this "permanent" category could have the following criteria and/or characteristics:

- Delivery of programs restricted to bachelor, sub-bachelor (including associate degrees) and foundation programs only.
- Recognition of a mature provider (for example, at least one cycle of successful HEP re-registration) with sound institutional governance and academic leadership, that offers a broad range of programs and student support services, with systematic and mature processes for quality improvement, and the maintenance of teaching and learning standards, and a strong history of regulatory compliance.
- An applied and industry-focused pedagogy that demonstrates strategies to address industry relevance, skills shortages and workforce development in its programs and services, and maintains the professional currency of its teaching staff.
- The utilisation of industry links and consultation to inform the development of its higher education qualifications, curriculum and graduate outcomes.
- A commitment to scholarship and knowledge creation whilst promoting teaching excellence through scholarly practice.
- Engaging and supporting local communities to meet social and economic needs.
- An adherence to qualification standards in pedagogy and professional practice.
- Engagement in applied research related to the disciplines taught and cross-disciplinary and/or discovery-based research with industry support for the purposes of enhancing teaching expertise and adding specialist knowledge.
- A capacity to self-accredit courses, in line with similar models in England, Wales and Canada.

In addition to the above, the University college category could contain a sub-category titled University College of Specialisation. This would allow for mature, low-risk providers to focus on delivery in one or two broad fields of study only. This sub-category aligns well with the Australian University of Specialisation category and will allow for further provider differentiation. The distinction would also enable prospective students and industry to identify NUHEP providers of choice within a particular area of specialisation.

Holmesglen notes that the University of Applied Science model, seen throughout Europe, could provide a useful framework and evidence-base to conceptualise the University college category. Another useful model comes from the Alberta (Canada), post-secondary Six Sector System that contains undergraduate universities with similar characteristics to those proposed in the revised Australian University College category. Holmesglen has developed collaboration and networks with these analogous systems to inform strategy and practice.

Benefits from the proposed revision to the Australian University College category

The needs of mature, low-risk providers would be served by the revision of the 'University College' category in that it would permit them to differentiate themselves from the other NUHEPs in the current unwieldy HEP category. It would allow NUHEPs to demonstrate their particular strengths and specialisation in teaching, delivery and student support at the level of undergraduate and lower qualifications.

Having an applied and industry-focused pedagogy as a criterion for the University College category would facilitate NUHEPs ongoing engagement in applied research through industry and community collaborations. This in turn would support and extend the benefits to students which flow from providing them with practical and employment-ready skills as well as the opportunity of undertaking collaborative applied research, thereby improving student outcomes and employability.

Students would benefit from a clear, distinct and effective category where they were able to identify the mature, low-risk providers who specialise in undergraduate delivery. This differentiation, coupled with admission transparency requirements and QILT information, would allow students to make a more informed choice as to where they will study.

Industry would also gain from a revision of the current Australian University College category. A provider in this category would have a curriculum informed by consultation with industry. The inclusion of criteria to engage in applied research would facilitate greater responsiveness to the needs of industry and respond to emerging needs for more specialised undergraduate or lower level courses, including para-professional qualifications. The growing need for para-professional qualifications, such as degree apprenticeships and Associate degrees that are 'shorter, cheaper and more vocationally focused on local industries'³(Parker, 2017) could be addressed through the undergraduate, applied learning focus of the proposed revised category, and further differentiate these providers from the University categories. There are potential gains for both students and industry from the provision of these vocationally focused, paraprofessional qualifications. This emphasis on applied research and advancement of applied knowledge would facilitate a greater degree of innovation and collaboration between such Colleges and industry, to meet industry needs and address Australia's innovation agenda.

Concluding remarks

The broader public interest would be well served by an effective, clear and workable set of provider standards.

Significant changes in the provision of HE have occurred since the introduction of the PCS. These changes are reflected in the growing diversity of NUHEPs and as a consequence the PCS do not reflect an ability for NUHEPs to "signal their point of difference, specialisation, or excellence against other higher education providers" (*Review of Higher Education Provider Category Standards Discussion Paper, 2018*).

³ Parker, S 'Degree apprenticeships bridge work and higher education – should we have them in Australia?' *The Conversation*, posted 30th August 2017

Of particular significance to Holmesglen Institute is the inadequacy of both the current Australian University College category and the HEP category. As proposed in this submission, the Australian University College category should be a stand-alone, rather than transitional, category for those mature, low-risk NUHEPs who do not aspire to enter the University category. The HEP category would remain for new NUHEPs who are yet to demonstrate their maturity in terms of low-risk, with well-developed internal governance and quality assurance processes or those who do not wish to become a University College.

Holmesglen welcomes the opportunity to discuss this proposal further and to participate in any future consultations relating to the PCS.

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