



INDEPENDENT
HIGHER EDUCATION
AUSTRALIA

SUBMISSION TO THE PROVIDER CATEGORY STANDARDS REVIEW

8 March 2019

Submission to: Australian Government Department of Education

Review: Provider Category Standards Review

Independent Higher Education Australia

IHEA represents the majority of Australia's registered and accredited independent higher education providers (including independent universities) with campuses across Australia. IHEA members educate students in a range of disciplines including Law, Engineering, Agricultural Science, Architecture, Business, Accounting, Tourism and Hospitality, Education, Health Sciences, Theology, Creative Arts, Information Technology and Social Sciences. IHEA members are higher education institutions with both for-profit and not-for-profit business models and they educate domestic and international students in undergraduate and postgraduate programs.

The Australian independent higher education sector comprises more than 130,000 students and 120 institutions, with independent providers variously accredited to offer courses across the full AQF range (diplomas up to doctorates).

IHEA holds a unique position within the higher education sector as a representative peak body of higher education providers only. Whilst some members are dual sector, only the registered higher education entity affiliates through IHEA membership.

Membership of IHEA is only open to providers that are registered with the Australian regulator – Tertiary Education Quality Standards Authority (TEQSA). Membership is also conditional on continued compliance with IHEA's Code of Good Practice.

IHEA's primary goal is promoting equity, choice and diversity for all Australian higher education students.

Executive Summary

Whilst IHEA believes that the current Australian Provider Category Standards (Category Standards) do not need wholesale reform, we argue that they could be reshaped to more effectively reflect and facilitate the diversity of Australian higher education, better recognise and allow more effective regulation of high quality and mature providers, and reduce or eliminate unnecessary barriers to entry level university status to reflect the evolving needs and educational aspirations of students.

A range of factors influence the capacity of the higher education system to meet the needs of the community, adequately support and develop Australian research, enable the contribution of international education to the Australian economy to prosper, and provide meaningful lifelong learning and employment outcomes to Australian students. Within this context the Category Standards give structure and definition to types of providers delivering higher education, and in turn, significantly impact the capacity and psyche of the sector to evolve to meet changing needs in the Australian economy.

Whilst this paper does not propose wholesale reform in the Provider Category Standards, other aspects of the system, including tertiary sector funding and the application of the broader HESF regulatory framework, do require urgent attention and reform. This paper however does not contemplate these issues which are outside the scope of this review.

The Provider Category Standards (PCS) are effectively binary in design and effect. Currently, they adequately define the requirements of an Australian University and provide a range of category options for university providers to reflect diversity in the publicly funded sector. There are five university categories available to 43 university providers.

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 which includes 127 providers in the Higher Education Provider (HEP) category.

This binary approach, then, does not allow for distinction between providers in the independent sector based on the maturity, teaching quality, student experience, discipline range and course offerings across all AQF levels by providers in the HEP category.

The dominance in enrolments, funding and political strength of the public university sector has resulted in an independent component that has evolved outside of the spotlight of the sector and community attention. For example, it would not be widely recognised that Australia's independent providers are more strongly post-graduate focused than public providers. According to 2017 Department of Education data, across the total university category 83.5% of the student load is at or below bachelor level with 16.5% in postgraduate studies. Five of Australia's Table A universities have less than 10% of their student load at the postgraduate level and a further 23 have a postgraduate load below 15%. Three of the four independent universities enrol a postgraduate load above the total category average. In the HEP category, the average for postgraduate load is 23.2%, well above the Table A average.

Australia's Category Standards have evolved largely through application of status of title. Whilst protection of the term university is a key underpinning of the categories, this review provides an opportunity to modernise the Standards to reflect the evolving contribution of the independent sector.

IHEA has grappled with the hierarchical and transitional nature of the Categories Standards. Whilst we question the practical benefit of a hierarchy of provider status to the Australian community, ultimately we recognise that a hierarchical interpretation is likely inevitable. This review does however provide an important opportunity to address the transitional nature of the Categories.

IHEA believes that the current Category Standards set the bar too high for access to the University College category and this is contrary to public interest. The University College category is an extremely valuable category with global recognition and provides the opportunity for greenfield entry and greater diversity to develop in Australia's university offerings. It is through this category, for example, that Australian governments may seek to achieve policy objectives of enabling institutions that meet economic, pedagogical and demographic needs in addition to the existing 43 universities. This category should also enable mature and high quality HEPs with a record of scholarship to access a university category, without necessarily requiring or presuming a transition to the Australian University category.

IHEA supports:

- Retention in the Categories of the concept that the title of university refers to an institution that has a strong research component and broad scope of intellectual inquiry and scholarship
- Greater opportunity for HEPs that engage in research and teaching to progress into the university categories
- Ongoing recognition of all current Australian universities in their existing categories
- Amendments to the Category Standards to better reflect the diversity of providers that currently exist in Australian higher education, particularly within the HEP category, with greater recognition of providers' scholarship and capacity. This in turn will reflect the quality and maturity of providers to students and the general community

IHEA proposes:

- **The addition** of one new category that formally recognises mature, high-quality HEPs with self-accrediting status
- **The revision of** the existing Australian University College category to remove the transitional requirements of category and the fixed requirement for multiple broad fields of study

IHEA opposes:

- The deletion of any of the current categories, as all contribute to the variety and diversity of the Australian higher education system with that diversity providing benefits to students and Australian society

Summary representation of IHEA's proposals

Appendix A Includes a list of responses to each of the review questions

Appendix B Presents in tabulated form the proposed characteristics for each of the Provider Categories

Appendix C Presents in tabulated form the proposed amendments to the PCS as drafted in the Higher Education Standards Framework 2015 (HESF 2015)

Responses to Review Questions

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

The primary characteristic in the PCS that defines universities from other higher education providers is the regulatory requirement of research and teaching. Fundamentally, the status of any university categorisation is built on a requirement to deliver original research. In Australia this is expressed through the Standards as requiring delivery to research doctorates - AQF level 10 - and a substantial contribution to the creation of new knowledge through research.

There is a long history in the Australian tertiary sector of an association between research and universities. Within this there is a broad pedagogical debate regarding the nexus between research and teaching as well as an historical reliance on the interpretation of this nexus to define a university.¹ IHEA believes the Australian community would benefit from an audit of the practical application and outcomes of this nexus across the Australian university sector.

The other common descriptor used to define universities is the concept of comprehensiveness of offerings. The key aspects of this include offering courses through the AQF range 7-10 across a regulated number of (at least three) broad fields of study. At the highest level this is applied rigorously in the Australian University category and underpins the definition of the other university categories.

On the surface, both of these defining concepts – research and broad offerings – are not sufficient to define a difference between universities and HEPs. There are HEPs with research doctorate programs and HEPs with comprehensive offerings. The key difference is the regulated framework that the Provider Categories impose.

IHEA believes that the definition of the research capacity and range of offerings required to attain a university title provides an appropriate basis for regulation across the total university category.

This paper proposes, however, modest, but important amendment to the criteria of the University College Category to enable it to be an effective and respected entry level University category.

The HEP category does not contain a regulatory requirement to provide research or a range of broad fields of study. IHEA supports retention of this.

There are currently HEPs that provide courses in single disciplines and at single levels of the AQF. These HEPs also provide valuable educational opportunities and the quality of their offerings is assured through registration and accreditation with TEQSA

RESPONSE

IHEA supports retention of the definition of 'higher education provider' and 'university' in the Provider Category Standards being based on a regulatory framework of research, comprehensive offerings and broad fields of study.

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

IHEA believes the PCS are not fit for purpose in terms of current and emerging needs.

The purpose of the PCS is to define Australia's higher education providers in order to set standards for operating in tertiary education that protect the quality and reputation of the sector.

¹ See, for example, Andrew Norton, *The Cash Nexus: How Teaching Funds Research in Australian Universities*, Grattan Institute, November 2015, pp. 31-2; Malcolm Tight, *Examining the Research/Teaching Nexus*, European Journal of Higher Education, 6:4, 2016, pp. 293-311 and Australian Government Productivity Commission, *Shifting the Dial: 5 Year Productivity Review*, Inquiry Report #84, August 2017, p. 108.

Diversity and Growth

As participation in Australian higher education continues to grow and the student cohort diversifies, there will be a need to diversify the types of providers and types of provision to respond to that change. The benefits of diversifying the range of providers and providing greater choice for students has long been recognised.² The current PCS are not sufficient to reflect the diversity of providers and to provide transparency to students and the community of the differentiation between them. Taking the opportunity that this review presents to create a categories' system that is better able to reflect and facilitate a diversity of providers and better differentiate between them will benefit the sector and public interest more generally.

Since the adoption of the National protocols that underpin the current PCS in 2000, the number of independent providers has increased from around 80 enrolling 18,000 students to over 120 providers enrolling over 130,000 students. This is a reflection of the broader growth in higher education generally, which has expanded from approximately 80,000 students in 2000 to 1.48 million in 2016.³ It is also a reflection of the demand by students for a different type of education.

The growth in the independent sector has meant that the number of providers in the Higher Education Provider category has expanded to 127 (as of the end of 2018). The lack of differentiation in this category results in a failure of the PCS to adequately define Australia's higher education providers. Subsequently, the PCS fails to serve a community interest in transparent definition of the maturity and quality of institutions within the HEP category.

Currently, the PCS contain five categories for universities allowing for a wide differentiation between different types of providers within this category. 43 universities are spread across the five categories. There is only one HEP category to represent 127 higher education providers regardless of their level of maturity or scope and depth of offerings.

Greater category diversification within the HEP category would be more transparent, more facilitative, and more encouraging of development. In turn this could potentially stimulate application of regulatory attention that recognises the individual context and history, value proposition and mission of independent HEPs in a more nuanced environment that rewards and recognises innovation.

There is an urgent need to differentiate more mature and established HEPs and the PCS needs to be developed to recognise greater differentiation in the sector than that which currently exists between Universities and HEPs.

Vacant or Little Utilised Categories

In consideration of 'fit for purpose' there is a need to examine the utility of the two vacant university categories and explore why they are not currently being used.

Australian University College

No provider has been registered by TEQSA in the Australian University College category. IHEA believes that non-utilisation of the "Australian University College" category reflects inadequate settings for that category. The requirement to have realistic plans to achieve Australian University status within five years and meet the substantive requirements of the College category, effectively requires meeting the Australian University Category characteristics on entry. There appears to be relatively little value in building a case to become a University College compared to mounting a case for Australian University. There is not enough middle ground or a mid-way point.

IHEA believes retention of the University College Category (in amended form) in modified form is essential to achieve 'fit for purpose' requirements of the PCS. University College is an extremely valuable category with international usage and recognition. Retention of the category also provides opportunity for greenfield entry to university status and for growth in diversity in Australia's university offerings. It is through this category, for example, that the Australian governments may seek to achieve policy objectives of enabling institutions that

² Griew, R., et al., *Diversity in Australian Tertiary Education: Turning Words into Action*, Nous Group, October 2018.

³ Norton, A. and Cherastidham, I., *Mapping Australian Higher Education 2018*, Grattan Institute, September 2018, p. 20.

meet economic, pedagogical and demographic needs in addition to the existing 43 universities. This category should also enable mature and high quality HEPs with a record of scholarship to access a university category, without seeking to transition to the Australian University category, with its requirement for comprehensive coverage of teaching, research and research training.

Although one of the purposes of the PCS is to protect the title of university (an aim that IHEA supports) the standards should not be so onerous as to prevent the movement into that category of quality and mature higher education providers who meet the high standards expected of an institution using that title. The standards should allow providers to progress into the university category as they are able to demonstrate they have achieved a certain level of quality and meet the university criteria. The standards should not be so onerous as to make it virtually impossible to gain the ability to use that title. The fact that since 2012 no provider has moved between the HEP and University categories is worth noting in the context of how onerous that transition is under the current framework and how to ensure the barrier is not prohibitive.

Australian University of Specialisation

Whilst there is currently limited use of the Australian University of Specialisation category, IHEA believes this category provides the opportunity for institutions focused on high level original research within specialised fields to develop and be recognised. This category limits Broad Fields of Study and enables, for example, a specialised focus on new or emerging disciplines without the requirement to develop and offer comprehensive offerings outside of a specialised focus. Additionally, a specialised ethos, such as that offered by the current University of Specialisation, delivers options for students, transparency to the community and an ability to specialise in fields of study relevant to high level research within the framework of that ethos.

Overseas University of Specialisation

For similar reasons offered in support of the Australian University of Specialisation Category, IHEA proposes retention of this category also. The growing internationalisation of education will see greater mobility for providers and students and a changing domestic landscape of providers. Retention of this category enables registration by a specialised overseas institution, delivering both opportunity for students and transparency to the Australian community.

RESPONSE

IHEA believes that the current PCS are not fit for purpose in promoting diversity and growth and in that there are underutilised categories. The Category Standards do not however require wholesale reform to improve recognition of diversity and transparency to the Australian community, rather minor amendments could be made that would address these issues.

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

New Category – Accrediting HEP

IHEA proposes that a new category - Accrediting Higher Education Provider - be created

Recognition of maturity and quality for HEPs within the existing framework is built on TEQSA's capacity to confer SAA on HEPs that meet specific criteria relating to quality assurance in the HESF (2015).

While the approval process for gaining SAA is subject to strict criteria set out in the HESF, the authority is not currently recognised by a separate provider category.

Given the significant status that is associated with holding SAA, 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.

A key element of TEQSA approval of SAA is a track record as a HEP including a threshold minimum of five years of operation. There are currently 12 HEPs with SAA and 81 HEPS with five or more years of operation. Under the current PCS, achieving SAA has not yet resulted in a category change. There have been no HEPS approved for category change by TEQSA.

Table 1: Current HEPS with SAA / On Category Change Pathway

5+ years Accreditation without SAA	Independent HEPs with SAA						Total HEPs with SAA	Category change under TEQSA
	SAA1 Year	SAA2 Years	SAA3 Years	SAA4 Years	SAA5+ Years	SAA5+& HDR SAA		
81	1	3	3	1	3	1	12	0

These figures indicate that demand for SAA assessment will continue to grow in the near future and that achieving SAA is not recognised through category change under the current PCS.

The rigor attached to SAA is more than simply years of operation. Under HESF 2015, a provider that is seeking authorisation to self-accredit a nominated course(s) of study must be able to demonstrate:

- 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
- 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
- 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
- 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:
 - completed at least one cycle of review and improvement in relation to all relevant standards
 - demonstrated successful implementation of evidence-based improvements arising from the reviews, and
 - has established these review and improvement activities as effective sustainable features of the provider’s operations across all courses of study.

Under HESF 2015 where a HEP is seeking self-accrediting authority for all courses of study that it offers, or may offer, in addition to meeting the above, the provider must be 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:

- 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
- capability in planning and establishment of new courses of study in new broad fields of study
- capacity for competent academic governance oversight and scrutiny of the accreditation of new courses in new broad fields of study
- 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 study, and
- where professional accreditation is applicable to otherwise self-accredited courses, professional accreditation can reasonably be expected to be obtained and maintained.

Attainment of SAA is both a result of rigorous assessment and a significant achievement of maturity and quality. SAA provides transparency to students, the higher education sector and the wider community that the HEP has achieved a level of scholarship, governance, quality and maturity. The attainment of SAA by existing HEPs but without category recognition results in an unstated or de facto category being defined within the sector. Recognition (and facilitation) is less than it should be – an Accrediting HEP category recognition would help address this.

IHEA believes that SAA should be the basis for a stand-alone HEP category, accessible to HEPs with any level of SAA with the following characteristics:

Table 2: Proposed New Accrediting HEP Category Standards Tabulated

	BFOS Min required	BFOS Max required	AQF Required	AQF Optional	SAA Status	How to Attain
Accrediting HEP	1	-	7	5-6 8-10	Partial HESF: B2(1)	<ul style="list-style-type: none"> • In accordance with current SAA requirements • Progression from HEP • Five years operation • Apply to TEQSA

Retention of Other Categories

IHEA proposes that no existing category be eliminated. The existing categories all serve different purposes and are necessary to reflect the diversity in the range of institutions that currently exist in the higher education system. The addition of the Accrediting HEP category will better reflect diversity and improve the transparency of the PCS.

RESPONSE 1

That a new Category – Accrediting HEP – be created.

RESPONSE 2

IHEA proposes that the following categories need to be retained (with some revision of the Australian University College category which is addressed below):

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

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

IHEA proposes that the Australian University College Category be revised.

Currently, the Australian University College category is under-utilised with no provider having achieved or been registered in this category under TEQSA. IHEA strongly supports the retention of this category, however, with modest, but important, revision to improve its utility to the sector and the Australian community.

The current HESF 2015 criteria for attaining the title of Australian University College include:

- A history of delivering undergraduate and postgraduate study and a Masters degree by coursework in at least three broad fields of study (BFOS); and,
- A Masters degree by research and doctoral degree by research offered in at least one broad field of study.

A University College must also have some form of self-accrediting authority and have “realistic and achievable” plans to meet all the criteria to move into the Australian University category within five years.

IHEA believes that the Australian University College Category is, and without revision will continue to be, underutilised as a result of the following factors:

- It is transitional and requires a provider to be intending to be realistically planning to attain Australian University status within a short period of time
- The method of analysis of ‘realistic and achievable’ plans is undefined – introducing significant uncertainty into the process

- The long time frames associated with developing a history of delivering the substantive courses of the category and 'realistic and achievable' plans to be an Australian University and their subsequent analysis
- The criteria of a history of delivering three broad fields of study to Masters Degree (coursework) level and Masters Degree (research) and Doctoral Degree (research) in one broad field of study has set the bar too high and wide for entry within the life of the current Standards
- It potentially results in a 'relegation' back to HEP category if plans to become an Australian University are not met or delayed – a substantial reputational risk for any provider considering this path

IHEA proposes that the Australian University College category be revised to remove the provisional and transitional nature of this category (i.e. criteria B1.3(1) see Appendix C).

IHEA believes that the category of Australian University College should be a standalone, rather than a transitional category. Providers within this category should not be required to establish realistic and achievable plans to become an Australian University within five years.

The current requirement of demonstrating a history of and continuing to deliver three BFOS up to AQF9 (coursework) and at least one BFOS to AQF 9 (research) and AQF 10 is too onerous for a category that ought to have significant utility as an entry level university category.

IHEA does not propose to remove the criteria to provide AQF 9 (research) and AQF 10 (research) in one BFOS from this Category. As previously stated, IHEA upholds the definition of a university category being based on delivering research programs. IHEA does however propose to remove the minimum requirements of other BFOS from this category.

IHEA proposes that the characteristics of the University College Category be represented as follows:

Table 3: Proposed Revised Australian University College Category Standards Tabulated

	BFOS Min req.	BFOS Max req.	AQF Required	AQF Optional	Self- Accrediting Status	How to Attain
Australian University College	1	-	7-10	5-6	Full Self Accreditation	Direct application to TEQSA
	-	-	7-9(c)	5-6 9(r)-10	Full Self Accreditation	Greenfield applications available

The effect of this is to require one BFOS up to AQF10 and remove the minimum requirement of other BFOS. The University College may self-accredit additional programs in other BFOS and, if doing so, is required to deliver them up to level 9 (Coursework).

This revision would open up the category of University College, make progression to it achievable from the Accrediting HEP Category proposed in this paper and allow suitably developed and resourced HEPs to enter this category directly. The category would be better equipped to be responsive to the policy objectives of the government and the needs of a diverse and changing sector. IHEA does not propose to diminish the assessment by TEQSA of sustained scholarship and other substantial characteristics as outlined in B1.3.

Removal of these BFOS requirements provides a capacity for the University College to develop programs over time and deliver these up to AQF 9 coursework level. **This differs from the University of Specialisation (UoS) category which limits the BFOS to a maximum of two and requires the UoS to deliver to AQF 10 in any BFOS they offer.**

At the same time, this proposal retains the requirement that a University College have the capacity to competently undertake research and research training in at least one broad field, thereby demonstrating its commitment, understanding and competence in one of the hallmarks of the university title as defined in Australia, namely engagement with research and research training. Further, this proposal would see a greater likelihood that a provider undertakes that activity really well through concentrated effort, rather than diluting its efforts across multiple required fields when doing so in the absence of public funding subsidies.

This proposal necessitates relatively minor revisions to the PCS at B1.3:

- To remove the requirement for this category to be transitional, section B1.3(1) is deleted
- To adjust the BFOS requirements, section B1.3(2) is amended
- To enable greenfield applications the wording of B1.3(5) is amended to explicitly permit that sustained scholarship can be demonstrated by a College's academic staffing profile, rather than the provider as an entity. Further, this change would allow a University College to add new course offerings without the need for the provider to show that it, as an institution, has had sustained scholarship in this new area. This allows the possibility of the providing hiring staff who possess that record of sustained scholarship to retain the necessity of a high standard of scholarship in the area.

These amendments are outlined in detail in Appendix C.

RESPONSE 1

IHEA proposes revision of the University College Category to remove the transitional and multiple BFOS requirements of the category and adjust the requirements of scholarship (without diminishing them) to allow expansion of the institution's offerings and allow greenfield entry.

RESPONSE 2

IHEA proposes that the following categories remain unchanged:

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

Each of these categories serves a distinct purpose and denotes a set of institutions that should be separately recognised within the higher education system.

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

IHEA supports policies that lead to a more diverse higher education system in Australia that better suits the needs of the diverse student cohort now participating in Australia's higher education system. This ultimately will lead to the best outcomes for providers, students, industry, the regulator and the general public.

IHEA's proposed changes serve the interests of:

Providers by

- Better recognising differences between them including quality and maturity
- Allowing options for different types of institutions to emerge and address the needs of diverse student cohorts
- Enhancing opportunities for providers to evolve with the needs of students
- Allowing for better international comparisons of institutions' labels
- Creating more attainable entry into the university categories
- Protecting the university title and the common understanding of it by not reducing the minimum entry requirements including the need for engagement in research
- Not eliminating any of the current categories or changing categories of existing providers

Students by

- Providing clearer signals about the differentiation between providers and allowing them a more informed choice about which provider best suits their needs

- Allowing greater diversity and focus of institutions in the higher education sector to better serve their needs
- Creating a Provider Category Standards system that better compares to international terminology and understanding
- Assists international students understand the nature of institutions within the Australian system

Industry by

- Providing greater recognition of providers that have achieved self-accrediting authority providers will incentivise providers to work towards that category and these are providers that can be agile and responsive to their needs

The Regulator by

- Providing a clearer set of criteria for the University College Category
- Allow for the reflection of its decisions to award self-accrediting authority to be more visible to the general public

General public by

- Enhancing and encouraging greater diversity in the range of providers delivering higher education that better supports the national economy while maintaining a robust system and protecting Australia's reputation for the provision of quality higher education

RESPONSE

IHEA's proposed changes would serve the interests of providers, students, industry, the regulator and the general public in a variety of important ways.

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Appendix A: Summary of Responses:

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

Response

IHEA supports retention of the definition of ‘higher education provider’ and ‘university’ in the Provider Category Standards being based on a regulatory framework of research, comprehensive offerings and broad fields of study.

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

Response

IHEA believes that the current PCS are not fit for purpose in the area of promoting diversity and growth and in that there are un and underutilised categories. The Category Standards do not however require wholesale reform to improve recognition of diversity and transparency to the Australian community, rather minor amendments could be made that would address these issues.

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

Response 1

That a new Category – Accrediting HEP – be created.

Response 2

IHEA proposes that the following categories need to be retained:

- Australian University
- Australian University of Specialisation
- Overseas University
- Overseas University of Specialisation
- Australian University College (revised)
- Higher Education Provider

Each of these categories serves a distinct purpose and denotes a set of institutions that should be separately recognised within the higher education system.

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

Response 1

IHEA proposes revision of the University College Category to remove the transitional and multiple BFOS requirements of the category and adjust the requirements of scholarship (without diminishing them) to allow expansion of the institution’s offerings and allow greenfield entry.

Response 2

IHEA proposes that the following categories remain unchanged:

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

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

Response

IHEA’s proposed changes would serve the interests of providers, students, industry, the regulator and the general public in a variety of important ways.

APPENDIX B – Proposed Provider Category Standards Tabulated

	BFOS Min Required	BFOS Max Required	AQF Required	AQF Optional	SAA Status	How to Attain	Notes
Australian University	3	-	7-10	-	Full SAA	Progression from HEP-SAA or AUC (85% SAA, 5 year rule – HESF B1.2(2))	Unchanged
Australian University of Specialisation	1	2	7-10	-	Partial HESF: B2	Progression from HEP-SAA or AUC (85% SAA, 5 year rule – HESF B1.4(2))	Unchanged
Overseas University	3	-	7-10	-	Partial HESF: B2	Apply to TEQSA Registered in home country Equivalent SAA (HESF B1.5(2))	Unchanged
Overseas University of Specialisation	1	2	7-10	-	Partial HESF: B2	Apply to TEQSA Registered in home country Equivalent SAA (HESF B1.6(2))	Unchanged
Australian University College	-	-	7-9(c)	5-6 9(r)-10	Full SAA	Direct application to TEQSA (Greenfield)	Amended Deletion of requirement to progress to University
	1	-	7-10	5-6	Full SAA		
Accrediting HEP	1	-	7	5-6 8-10	Partial HESF: B2(1)	Progression from HEP Five years operation Apply to TEQSA	New <ul style="list-style-type: none"> Enables SAA Must provide degrees Doesn't require AQF above 7
HEP	1	-		5-10	Accredited by TEQSA	Direct application to TEQSA	Unchanged

APPENDIX C – Proposed Provider Category Standards

Category	Current Criteria	Proposed Criteria
B1.1 Higher Education Provider	<p>The higher education provider offers an Australian higher education qualification and/or an overseas higher education qualification</p> <ol style="list-style-type: none"> 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. 	<p>Same as current</p>
<p>(New Category) Accrediting HEP [would become B1.2]</p>	<p>None – new category</p>	<p>The higher education provider offers an Australian higher education qualification and/or an overseas higher education qualification</p> <ol style="list-style-type: none"> 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. 5. The higher education provider has been approved by TEQSA to self-accredit any one or more course of study it offers.

Category	Current Criteria	Proposed Criteria
<p>B1.2 Australian University</p> <p>[would become B1.3]</p>	<p>The higher education provider offers an Australian higher education qualification</p> <ol style="list-style-type: none"> 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. 	<p>Same as current</p>

Category	Current Criteria	Proposed Criteria
<p>B1.3 Australian University College</p> <p>[would become B1.4]</p>	<p>The higher education provider offers an Australian higher education qualification</p> <ol style="list-style-type: none"> 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. 	<p>The higher education provider offers an Australian higher education qualification</p> <ol style="list-style-type: none"> 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. (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 (Coursework) in at least three one or more 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. (2) 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. (3) The higher education provider demonstrates the commitment of teachers, researchers, course designers and assessors to the systematic advancement and dissemination of knowledge. 5. (4) The higher education provider and/or the provider’s staff demonstrates sustained scholarship that informs teaching and learning in all fields in which courses of study are offered. 6. (5) 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. (6) 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. (7) The higher education provider demonstrates engagement with its local and regional communities and demonstrates a commitment to social responsibility in its activities. 9. (8) The higher education provider has systematic, well developed internal processes for quality assurance and the maintenance of academic standards and academic integrity. 10. (9) The higher education provider’s application for registration has the support of the relevant Commonwealth, State or Territory government.

Category	Current Criteria	Proposed Criteria
<p>B1.4 Australian University of Specialisation</p> <p>[would become B1.5]</p>	<p>The higher education provider offers an Australian higher education qualification</p> <ol style="list-style-type: none"> 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. 	<p>Same as current</p>

Category	Current Criteria	Proposed Criteria
B1.5 Overseas University [would become B1.6]	<p>The higher education provider offers an overseas higher education qualification</p> <ol style="list-style-type: none"> 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. <p>AND</p> <ol style="list-style-type: none"> 2. The higher education provider meets criteria equivalent to those for the “Australian University” Category. 	<p>Same as current</p>
B1.6 Overseas University of Specialisation [would become B1.7]	<p>The higher education provider offers an overseas higher education qualification</p> <ol style="list-style-type: none"> 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. <p>AND</p> <ol style="list-style-type: none"> 2. The higher education provider meets criteria equivalent to those for the “Australian University of Specialisation” Category. 	<p>Same as current</p>