RESPONSE FROM MACLEAY COLLEGE TO THE REVIEW OF THE HIGHER EDUCATION PROVIDER CATEGORY STANDARDS

The review of the PCS is timely and appropriate. The existing system has served reasonably well to date but does not accommodate the rapid and continuing growth in scale and complexity of the Higher Education sector.

The review has particular relevance to Macleay College. The College has included in its strategic plan a range of activities and developments over the next several years that will assist its application for Self-Accrediting Status. The College is using the conditions for a change of status as criteria to judge all of its development decisions.

Following are comments on matters raised in the discussion paper.

1) Differentiation and Criteria

Macleay College agrees that the Provider Categories might be made more useful if they were able to differentiate more effectively. Certainly this is the case for the current category of Higher Education Provider which includes 127 institutions of significantly different size, staff capability, existing PCS status, and strategic direction. The consequence is limited ability to discern the range, approach and focus of widely different institutions with widely different corporate and ownership structures, as well as different objectives in terms of graduate outcomes and industry orientation. Indeed, it is noteworthy that the 40 universities already clearly differentiate among themselves – Sandstones, Red-Bricks, Regional, etc.

Perhaps the PCS would benefit from a more fine-grained approach to the Provider Categories as well as more flexibility - recognising that as the sector continues to grow and develop there is likely to be more demand for movement between Categories. It seems likely that new institutions that enter the system under one category may well expect to develop and change their focus. The PCS needs sufficient flexibility and clarity to accommodate such changes.

There is a question around the matter of location and mode of delivery in all categories. If the PCS taxonomy is meant to be useful in an analysis of efficiency and effectiveness, it would be useful to know whether awards are delivered primarily on-line or via the traditional face-to-face approach. In addition, given that some institutions offer a range of awards on different campuses, it would be also be instructive to know the degree to which these alternative campuses offer common quality of teaching and student experience. Clearly a course offered by a regional institution at their local campus provides students and their subsequent employers with a different package of utility than the same course offered in their city high-rise building.

Given the possibility of new institutions seeking to establish themselves in Australia and Australian institutions seeking to establish operations overseas (amplified by recent free trade agreements), the treatment of new entrants requires special attention. Perhaps the PCS needs greater flexibility and some means of entering/changing categories on a probational basis and/or with conditions.

2) Teaching, Research and Scholarship

The Higher Education Sector generally is plagued by an assumption that there is a direct and positive relationship between 'the conduct of research' and the 'quality of teaching'. This assumption is not based on substantive evidence but, nevertheless, is constantly proffered as justification for the use of teaching funds to underpin research and the subsequent obfuscation of related accountabilities. To question the validity of this relationship is viewed by all those who benefit from its promulgation as a form of heresy. Yet it serves to distort both the funding model and status assignation.

In earlier times there was an assumed relationship between 'scholarship' and the quality of teaching. Even this may have been questionable. Nevertheless, it is more likely to have had some validity. But in the years following World War II, the scale of funding available to support leading edge research in mainstream universities (particularly in the USA) tended to conflate the older concept of 'scholarship' (wide reading, deep reflection, synthesis and articulation) and 'research' (discipline focussed, driven by problem-based objectives and publication). Over the following decades, the value of academics to their institution became more strongly concerned with their capacity to win research grants and publish rather than the quality of their teaching. It is often suggested that this is heresy of another kind – surely all universities seek to employ and promote people who are good at teaching, research and other things.   An analysis of the results of recent QILT Surveys might suggest otherwise.

The above polemical is driving toward the proposition that the PCS should be more definitive in its recognition of the concept of a legitimate university based primarily on the excellence of its 'scholarship' and good teaching, rather than on the more narrowly framed (and we believe questionable) assumption of a correlation between 'research' and the quality of teaching. It may well be time to reintroduce something like the concept of Colleges of Advanced Education. We are not advocating a retrograde step – there were many faults in the former CAE system – but rather something more akin to the German concept of a technological or applied university where their status as a post-secondary institution is more commonly based on the effectiveness of their teaching.

If such a shift in the whole institutional framework is not possible, then the revised PCS should at least provide room to recognise as Universities those institutions that are primarily based on 'scholarship' and excellent teaching without necessarily including a leading-edge research program. Indeed, if *research impact* was used as the measure of quality rather than the number of publications, perhaps more than half of the institutions in Australia currently recognised as universities would only be able to justify their position on the basis of their teaching but would struggle to maintain their status on the basis of their research.

In order to accommodate the risks associated with a poorly defined research focus, many universities have adopted or are considering a model which allows the appointment and retention of 'teaching-focussed' staff. Without a change in the thinking around the definition of what constitutes a university, there is a risk that these teaching only staff – who might in fact be excellent scholars under the unadulterated definition – will be regarded as second-rate citizens and those universities that adopt the strategy as lesser institutions.

3) The Funding Model

The funding model applied to students of Higher Education Providers (including a 25% Administrative Fee) is not recognised in the PCS but certainly reinforces differentiation of status. The market quite rightly assumes that this fee is a reflection of a real difference in the degree to which the government recognises the quality of what is on offer – it does not assume the difference is merely administrative. The additional fee is generally seen as inequitable and a penalty.

The argument that the fee is a reflection of real administrative costs is spurious and cannot be demonstrated – the same costs apply to most if not all students in institutions recognised as universities. The argument that this imposition somehow offsets the need of recognised universities to cover the costs of research from their teaching capitation grants is likewise unsupportable. However, this difference in the real cost to students unnecessarily and unhelpfully emphasizes the difference between exactly the same course of study offered by a recognised university and that offered by a non-self-accrediting Higher Education Provider where, it could be argued a more rigorous and independent process of accreditation has been applied.

While it is not currently in the remit of this review, it is a significant point of differentiation and should not be ignored. Certainly the domestic education market considers it to be important.