



MELBOURNE INSTITUTE OF TECHNOLOGY

Submission to the Review of the Higher Education Provider Category Standards (The Coaldrake Review)

6th March 2019

Introduction

Melbourne Institute of Technology [MIT] welcomes the opportunity to provide comments on the Review of the Higher Education Provider Category Standards. MIT considers that the Category Standards should be revised: to more closely align with the Higher Education Standards Framework [HESF]; to permit further differentiation between the differing types of higher education providers; and, to provide prospective students with a clearer view of the characteristics of individual higher education providers.

MIT provides considered views on each of the questions posed by Emeritus Professor Coaldrake and focuses on the opportunity to further differentiate between higher education providers. MIT also makes comment on the particular criteria that must be currently met for a higher education provider to be classified as an Australian University College, and suggests that the criterion *'plan to meet all the criteria for an Australian University Category within 5 years'* be no longer required.

To simplify matters, in this document we will not pass any comments on provider categories B1.5 and B1.6 (overseas institutions).

MIT responds to the questions put by Emeritus Professor Coaldrake below:

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

In answer to the question, MIT considers that to define an overarching 'higher education provider' category it is only necessary to state that a provider meets the standards in the HESF and offers at least one accredited course of study; in relation to the characteristics of an institution in the "university" categories, MIT is generally comfortable with the current defining characteristics.

The overarching category (B1.1): 'Higher Education Provider'

In the current Criteria, all higher education providers, regardless of the additional criteria required for the other categories, must meet the criteria under the current *'Higher Education Provider'* category. The most fundamental criterion in this category is that higher education providers meet the HESF and offer at least one accredited course of study. Given that the HESF is all encompassing, this provides an overarching quality for all higher education providers. The following three criteria are not anywhere near as demanding as the first criterion, that of meeting the HESF. Additionally, the remaining criteria are embedded in some form, and often in multiple sections, of the HESF. We would suggest, therefore, that these three criteria be dropped from the base level requirements.



We propose that the requirements for the 'Higher Education Provider' category be simplified to:

- They meet the HESF
- They offer at least one accredited course of study

If the criteria B1.1.2, B1.1.3, and B1.1.4 in the current Provider Category Standards were dispensed with, that leaves all potential non-university categories with a single criterion in common, that of meeting the HESF and offering one accredited course of study. This opens the way to construct new categories for non-university providers who are not positioned or may not desire to meet the additional criteria for categories B1.2, B1.3 and B1.4, as we suggest below.

Those higher education providers that only meet criterion B1.1.1 would remain in B1.1.1 and would continue to be termed '*Higher Education Provider*'.

Categories that include the word "University"

The defining characteristics of a university include: offering a defined range of undergraduate courses and Masters and Doctoral degrees by research and, undertake research. This is broadest for the 'Australian University category (B1.2) and narrowest for the Australian University of Specialisation category (B1.4). The remaining criteria are variations on themes of: the advancement and dissemination of knowledge; sustained scholarship; good practices in teaching and learning; an extensive range of student services; commitment to local and regional communities; and, high quality processes for quality assurance including academic standards and academic integrity.

The 'Australian University College' category (B1.3) respects the common requirements, but also includes the need to demonstrate that they have '*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*'.

The current criteria ensure that to be classified as an Australian University, a provider must: offer a range of courses of study across a range of broad fields of study; fields including Masters Degrees [Research] and Doctoral Degrees [Research] ; be authorised to self-accredit to doctoral level; undertake research at least in those broad fields of study in which research Masters and Doctorates by research are offered; demonstrate commitment to the advancement and dissemination of knowledge; demonstrate sustained scholarship; demonstrate good practices in student learning and teaching; provide of an extensive range of student services; be engaged with its local community and committed to social responsibility; demonstrate systematic quality assurance and maintenance of academic standards and academic integrity; and, have the support of the relevant Commonwealth, State or Territory government.

MIT supports these current general criteria as stated in the Provider Category Standards for a higher education provider to use the title "university".

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

From MIT's perspective, the PCS Categories for 'Australian University' and 'Australian University of Specialisation' categories fit the community's current and future needs, and do not require modification,



but the criteria for the 'Higher Education Provider' category (see response to Question 1 above), and the 'Australian University College' category (see response to Question 4 below) should be modified to look to the future.

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

With regard to the current Category of Higher Education Provider [B1.1], MIT is of the view that the current criteria B1.1.2, 1.1.3, and 1.1.4 in this category should be dispensed with, leaving all the categories [B1.1, B1.2, B1.3, B1.4 and B 1.5] with a single criterion in common, that of meeting the HESF and offering at least one course of study. This opens the way to construct new categories for higher education providers who do not aspire to university status in the near term, but are providers who by their demonstrated performance might be further differentiated from the first Category of 'Higher Education Provider'.

MIT suggests the introduction of two new categories

Possible additional categories may be the following with the following additional criteria. The suggested category names are provisional, and provided simply to enable them to be referenced.

B1.6: Australian Institute of Higher Education:

Criteria: Offer undergraduate or postgraduate courses of study or both in at least three broad fields of study; demonstrate sustained scholarship; be able to demonstrate good practices in student learning and teaching; be a provider of an extensive range of student services; be engaged with its local community and committed to social responsibility; demonstrate a mature approach to quality assurance and the maintenance of academic standards and academic integrity.

This category is introduced to enable categorisation of higher education providers which have moved beyond a single discipline and can demonstrate maturity, especially in learning and teaching, scholarship, academic standards and quality assurance, but have not yet progressed to self-accreditation.

B1.7: Australian College of Higher Education:

Criteria: a range of courses of study across a range of broad fields of study; the authorisation to self-accredit to Masters level in at least one discipline; commitment to the advancement and dissemination of knowledge; demonstrate a record of sustained scholarship; be able to demonstrate good practices in student learning and teaching; a provider of an extensive range of student services;

engaged with its local community and committed to social responsibility; a demonstration of systematic quality assurance and maintenance of academic standards and academic integrity.

This category is introduced to recognise at least partial self-accreditation status, sustained scholarship, and demonstration of systematic quality assurance.



Question 4: Do specific categories need to be revised? How?

As well as the suggested revision of PCS category B1.1 as outlined above, MIT considers that the criteria in current category B1.3, the 'Australian University College' category should be revised through the removal of the first criterion *'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'.*

The major reason for suggesting this revision is that it permits particular higher education providers to aspire to and achieve this status without the deadline of being expected to achieve Australian University status within 5 years. It allows the provider to focus on as few as one discipline from the research degree perspective, whilst offering a range of disciplines at undergraduate and post-graduate level, and frees the provider to approach the achievement of the next level (which requires extending research training into further disciplines) in its own time and especially when it considers that it will be ready to do so.

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

MIT considers that its suggested changes achieve the following:

- The provision of a very clear view to students, the broader public and the regulator, that all higher education providers meet the HESF and offer at least one course of study.
- It reinforces to students, industry, the public and the regulator, that universities at their most basic, offer a broad range of courses, including those of research training, at multiple levels, are research-active and are committed to the pursuit of scholarship and their communities.
- The introduction of new categories for non-university higher education providers provides students, industry, the public and the regulator, that there are providers that have demonstrated achievement in learning and teaching, scholarship, quality assurance that is well above the minimal criteria for classification as a higher education provider.
- MIT's suggestions with regard to the University College Category, encourages the higher quality non-university higher education providers to gain well-deserved recognition without the need to commit to the next phase of reaching university status. This again, provides a signal to all interested parties that such University Colleges are demonstrably high caliber.