

Navitas response –

Review of the Higher Education Provider Category Standards

Navitas welcomes the opportunity to contribute to thinking on possible reforms to the Higher Education Provider Category Standards (PCS). We have undertaken a robust consultative process across our organisation, including with eminent higher education policy thinkers on our governing boards and the like, to inform the following response.

Purpose of the PCS

Navitas believes that the key functions of a reformed PCS are to:

- Name and clearly define the characteristics of the various categories of higher education provider types in Australia
- Form part of the quality standards for which institutions can operate in the Australian higher education sector
- Support diversity in the Australian higher education sector
- Provide a set of standards that resonate with and are well understood by providers, consumers/students, regulators, governments, employers/industry and the broader community, both in Australian and around the world

Thinking that informs our position on reforms to the PCS

There are some key points that underpin Navitas' thinking on the future direction of the PCS. These are summarised here.

Reform required to ensure PCS are fit for purpose

- The current PCS are not fit for purpose and require amendments to support the sector now and into the future. The higher education landscape is changing. Both the PCS and the Australian Qualifications Framework (AQF) – also currently being reviewed – must adapt to be flexible enough to appropriately reflect the changing nature of tertiary education.

Reform should focus on the key function of the PCS

- The primary function of the PCS is to name and clearly define the various categories of higher education provider types in Australia.

- As the PCS is a categorisation system for the Australian higher education system,¹ it should not be used as a de-facto funding categorisation system. Other instruments, such as the Higher Education Support Act, are more appropriate mechanisms to deal with funding considerations, e.g. allocations for independent and public providers, and Australian and overseas providers.
- If funding considerations are set aside, there is a genuine opportunity to simplify the PCS and reduce currently unused or under-utilised categories.

The role of hierarchy

- Even with reforms to the PCS, some form of hierarchy, implied by the current PCS, is inevitable. Notwithstanding, there should be explicit acknowledgement in the PCS that providers – as long as they meet the criteria – should be able to easily transition between categories. Further, the revised PCS must move away from the idea implied in the current PCS that all providers aspire to be at the top of a “uni-directional” hierarchy.

Language and labels

- The current language used in the PCS is not well understood, particularly by students and the broader community. Clearer language should be used, particularly to label the various categories.

Recommendations for revised PCS

Provider categories

Navitas recommends that there be four categories. The recommended names and key attributes / criteria of each are outlined below.

Recommended Category Name	Attributes / Criteria
Higher Education Provider	Broadly the same as the current standard for HEP providers. This group of providers would typically be institutions that do not have any level of self-accrediting authority (SAA).
Teaching University	Defined by having some level of self-accrediting authority. Must offer at least up to the current AQF Level 9. May also offer up to the current AQF Level 10, however those offering Doctoral Degrees must undertake original research in the field/s of study in which they offer those degrees.

¹ Terms of reference of the PCS review, page 5, *Review of the Higher Education Provider Category Standards: Discussion Paper*, December 2018.

Recommended Category Name	Attributes / Criteria
Specialist University	<p>Defined by having some level of self-accrediting authority.</p> <p>Must offer at least up to the current AQF Level 10 and undertake original research in the field/s of study in which they specialise.</p>
Comprehensive University	<p>This category of providers would largely reflect the current group of comprehensive universities operating in Australia. Navitas does not presume to suggest what the attributes of this group should be beyond positing that it would include full SAA coupled with a comprehensive research agenda focused on the generation of new knowledge.</p>

Third party providers

Navitas does not recommend a separate category for third party providers. That said, we note that the onus is on the accredited higher education provider to strictly adhere to the Threshold Standards in respect to its third party arrangements. We therefore support greater transparency of these arrangements, including through the potential establishment of a public register administered by the Tertiary Education Quality and Standards Agency.

Submitted by Navitas Limited

Level 8, Brookfield Place

125 St Georges Terrace

Perth WA 6000 Australia

Contact: Kadi Taylor – Head, Strategic Engagement and Government Relations

(Kadi.Taylor@navitas.com or 0498 020 978)

8 March 2019