

28 February 2019

Emeritus Professor Peter Coaldrake  
Higher Education Standards Panel  
Dept of Education and Training

Dear Emeritus Professor Coaldrake,

**Re: Review of the Higher Education Provider Category Standards**

The College of Law is pleased to contribute to the review of the PCS (and AQF) and believes the review to be timely. The market for higher education, both in Australia and internationally, is in considerable flux due to multiple factors, not least the evolving complexity of the global economy and the need for students to equip themselves to take advantage of emerging opportunities, many of which are now impacting on the professional services sector in unpredicted ways.

***Provider Category Standards***

The term "Higher Education Provider" (HEP) encompasses a large range of providers and courses with great variation in size, location, discipline and quality. It is submitted that the term HEP is too undifferentiated to send appropriate messages to the sector – including the students - regarding the academic emphases and relative positioning of each provider on the scores of quality and relevance. This is in contrast with the term "university" which implies a warranty to the sector regarding standing, character and quality.

This message may not always reflect accurately in every discipline area, particularly in the professional services areas. HEPs which grew out of industry or the professions to provide specialised, sector-tailored courses do regularly exceed universities in quality, innovation, outcomes for graduates and reputation, but nonetheless suffer in the market via label comparison, particularly in international markets.

High quality HEPs of good standing and high ambition who already operate competitively against the universities may aspire to become themselves universities but be cautious about how criteria for university status are currently structured, as for example the need to offer both undergraduate and higher research degrees and criteria regarding research output.

The College believes that the gap between SAA HEP and University of Specialisation is too wide and that thought should be given to the creation of a transitional category which is either a teaching intensive university (with less need to focus on research), or something less than a university but reflective of standing in the sector, and the quality and status requisite to being awarded Self Accrediting Authority.

Such a transitional institution might have some or all of the following characteristics:

- High standing and market recognition
- Focus on postgraduate programs only
- Self Accrediting Authority in one or more areas
- Straightforward (self driven) process to extend SAA into other disciplines
- Focus on teaching and learning with emphasis on professional scholarship rather than pure academic research
- Some access (as relevant) to research and other Cth funding

How such an institution might be named is important, certainly to the institution itself, but also to the broader market place and the students who hope to graduate. The name university should be protected but something that qualifies "university" could both achieve that protection and also recognize the sub-category proposed. University College would be an appropriate term were it not already in use although perhaps some redefinition would be helpful. University Institute or University Academy might be alternative terms or a name incorporating the applied, technical nature of the specialty, as for example University of Applied Law (Health Sciences, Finance etc.)

### ***Research & Scholarship***

Specifically with regard to the importance of research to the PCS, the College (while actively seeking to improve its research profile) does not believe the evidence to be conclusive regarding the oft-stated nexus between research and quality teaching. It is important for academics to be across the latest literature and practice (including SOTL) regarding their discipline and that, we would suggest, is more important than formal research which may, in any case, be in very niche areas beyond an academic's main teaching responsibilities.

We would suggest that quality teaching and learning are just as important as the generation of new knowledge and that greater emphasis on teaching is warranted with a view to equipping and inspiring future generations of higher education students to take their places in the evolving economy and workplace.

Of course, there is an important need for universities to go on generating new knowledge but that is not to say all universities need to be so oriented. A teaching intensive university (or other transitional entity) which was more geared towards the other inputs of quality teaching and learning would be a valuable inclusion within the PCS. Other inputs would include scholarship, professional practice recognized as scholarship in action, SOTL, and other evidence which could satisfy regulators that curricula were designed and delivered in contemplation of the latest research, practice and thinking regarding a particular discipline.

### ***Australian Qualification Framework***

The College believes that the AQF is reasonably effective to define and delimit the various levels of higher education award, although some simpler language could be used to articulate the knowledge and skills which constitute each.

To the extent that additional awards might be included in the PCS (such as micro-credentialing), we believe that would probably serve to stifle innovation through the need for accreditation and reporting formalities (and potentially teach out requirements where courses fail). Short courses (and their taxonomy) are probably best left to the judgment of agile institutions wanting to be fast and flexible as they perceive and service the more immediate professional and career needs of students.

### ***Conclusion***

There are a number of high quality HEPs operating at the same or better level than universities in specific fields or courses who are nevertheless disadvantaged in the market place due to the value of the word university. Such institutions tend to be innovative, fast, flexible and highly student oriented. A transitional category and taxonomy reflecting standing and quality would encourage such institutions to further evolution of their programs and program delivery, and give students (and their employers) greater confidence in choosing them for their education and career needs.

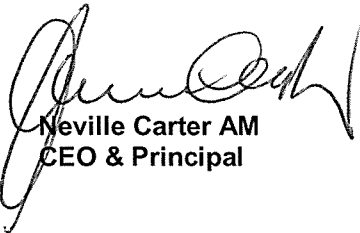
Such a transitional category, giving additional status and benefits to those institutions which merited them, would also inspire other HEPs to raise their standards in order to qualify, and likely oblige the universities with whom they compete to lift their games in order to maintain their market position.

The fruits of scholarship (including professional scholarship in action) are arguably just as effective to achieve good teaching and learning outcomes as traditional research, and even better than formal research where professional skills courses are concerned.

The word university should continue to be protected to ensure Australia's reputation for quality higher education, but that does not mean institutions of high standing and quality should be excluded from the category (or a transitional category) due to their inability to satisfy all current requirements for university status. Teaching intensive universities or postgraduate only universities ought to be seriously considered for inclusion in the PCS.

Thanks again for opportunity to make a submission and I look forward to seeing the committee's report and recommendations. Feel free to contact me at any time regarding this submission or anything else.

Yours sincerely



**Neville Carter AM**  
**CEO & Principal**