



Our ref: 2015/216

Department of Education and Training
GPO Box 9880
CANBERRA ACT 2601

Via email: PCSReview@education.gov.au.

6 March 2019

Dear Sir / Madam

Review of the Higher Education Provider Category Standards – Discussion Paper

The University of Adelaide welcomes the opportunity to provide feedback to the Review of the Higher Education Provider Category Standards – Discussion Paper released on 5 December 2018. Additional detail to this submission can be provided on request.

University of Adelaide Submission

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

A differentiating factor between universities and other HEP’s is that all universities, to a greater or lesser extent, have core teaching and research missions and values, often written into the Acts of Parliament that created them.

The research-teaching nexus is extremely important and therefore we believe that the current requirement for universities to research and teach should remain as a characteristic for the PCS. In particular, that research, scholarship and range of undergraduate and postgraduate academic offerings be at an appropriate scale. Whatever drivers have contributed to this model (eg the current federal funding model), this definition has contributed to the good reputation of Australia’s Universities internationally.

Other distinguishing features of a “university” should also be given more emphasis within the PCS such as size, nature and scale of resources required to deliver a “university experience”, including how these are delivered in various campuses both on-shore and off-shore.

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

Areas that test the current PCS include, for example, the growth of online learning providers; dual sector qualifications; cross-institutional collaborations. The PCS currently provide little reference to innovative providers of learning and educational programs with whom Universities are seeking to establish collaborative relationships. Defining the characteristics of such providers within a revised PCS would give prominence to a contemporary framework within which such providers can identify, and with whom other providers can engage with assurance of quality.

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

The small number of providers represented in 4 of the 6 Categories suggests that these be reviewed for relevance and currency. Given the University's view that the teaching-research nexus remains a key characteristic of "Australian University" and that research, scholarship and community engagement be at an appropriate scale, the University suggests the following two Categories are redundant: Australian University of Specialisation; and, Overseas University of Specialisation.

The Australian University College Category may have relevance provided that the current requirements for this Category are revised to:

- align with those for the Australian University Category;
- remove the 5 year time limit in which to meet the full requirements for an Australian University Category; providers within the Australian University College Category should be supported to progress in stages, with no time limits on the amount of time required to progress through each stage.

As the Discussion Paper highlights, "Greenfield" universities are currently not referenced within the PCS. It is the University's view that this type of institution should not be permitted to operate as a University in compliance with a sub-set of requirements as they scale up to full operation. In reference to our view expressed in 1 above, it is important to retain a consistent definition of a "University" in maintaining the high level of international recognition of the quality and excellence of universities in Australia.

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

The University acknowledges that there are increasing numbers of HEP's that are not universities. Given there are currently 127 providers in the HEP Category, real differentiation is not currently reflected in this Category. The University agrees with the Discussion Paper that broad minimum requirements become the focus rather than their point of difference by which excellence can be measured.

By way of example, a relatively new hybrid institutional model has developed as a result of the increase of pathway programs and this new model is not currently well addressed. Pathway colleges linked to universities should have their own stand-alone category. The key requirements should provide clarity over the responsibilities of these providers in enabling Universities to maintain compliance with the standards in the HESF that relate to third party providers.

Yours sincerely



PROFESSOR PETER RATHJEN
Vice-Chancellor and President

cc: Director, Learning and Quality Support