



8 March 2019

Department of Education and Training
PCSReview@education.gov.au

Review of the Higher Education Provider Category Standards

Thank you for the opportunity to make a submission to the Review of the Provider Category Standards. This review completes the full reviews of the standards framework for higher education, ensuring that the full suite of standards are fit for purpose and appropriate.

For the purposes of regulation, the University of South Australia (UniSA), is of the view that the definition of a university within the provider category standards is appropriate and fit for purpose. We support the comments made by the ATN, that the definition of a university as provided through the standards, reflects the role and purpose of a modern university in exhibiting leadership and excellence in all facets of university activity; namely teaching, research and scholarship. While the balance and emphasis of activity might vary between universities, the category 'Australian University' provides an appropriate range of criteria, which together with the requirements of the Provider Registration Standards, represent what is and should be expected of an organisation that wishes to operate in Australia as a university.

Australia should rightfully expect of its universities, teaching that is informed by research and scholarship, research that contributes to the prosperity of the country and graduates that have experienced and benefited from a learning environment and curriculum that is underpinned by new knowledge and leading-edge practice.

On this basis we believe the 'Australian University' and other university categories are sound. The concept of specialist universities is reasonable provided that it also meets the full range of Provider Registration Standards, ensuring that while specialist it is still providing a comprehensive teaching and research environment within those specialist disciplines.

For overseas universities wishing to operate in Australia, the 'Overseas University' category ensures that such providers are of an equivalent standard to an Australian university. This is critical in an international education market where, the term 'university' is less regulated in its use.

We do acknowledge that there is a technical difficulty with the University College category that needs to be resolved. Our view however is that the intent of the category is appropriate, that is, that it provides a mechanism by which other forms of providers may progress toward full university status. We do not support the alternative view that this become a category within its own right without first also considering the potential differentiation within the 'Higher Education Provider' category.

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With regard to the possibility of further differentiation within the 'Higher Education Provider' category, while UniSA is open to further discussion on this matter, we do have reservations about the use of a *regulatory instrument* for the purposes of differentiation which might more appropriately fit with the individual vision, mission and purpose and marketing strategies of a particular organisation. However, we accept that the full Standards Framework serves a broader purpose in establishing the quality of Australia's higher education system nationally and internationally and that further categorisation may support the needs of students and industry.

In summary, UniSA is of the view that the Provider Category Standards are generally fit for purpose, noting the technical issue with one category that needs to be resolved, and provides an appropriate definition of a university and university system that is comprehensive, of high standard and best placed to meet Australia's social and economic needs now and into the future.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'David Lloyd'.

Professor David G. Lloyd
Vice Chancellor and President