UTS Insearch
UNIVERSITY OF TECHNOLOGY SYDNEY

Insearch Limited ABN 39 001 425 065
PO Box K1085, Haymarket
NSW 1240
Australia
Level 9, 187 Thomas Street
Sydney NSW 2000
Australia

- T +61 2 9218 8600
- F +61 2 9281 5915

insearch.edu.au

UTS CRICOS provider code: 00099F
Insearch CRICOS provider code: 00859D
Insearch Limited is a controlled entity of the University of Technology Sydney (UTS), a registered private higher education provider of pathways to UTS.

8 March 2019

Emeritus Professor Peter Coaldrake AO
PCSReview@education.gov.au

Dear Emeritus Professor Coaldrake

REVIEW OF THE HIGHER EDUCATION PROVIDER CATEGORY STANDARDS (PCS)

Thank you for the opportunity to comment on this discussion paper.

Discussion question 1: What characteristics should define a 'higher education provider' and a 'university' in the PCS?
Discussion question 2: Are the PCS fit for purpose in terms of current and emerging needs? Why?

Insearch believes that it is appropriate to differentiate between 'higher education providers' and 'universities' based on the characteristics in the current PCS. However, the title 'Non-University Higher Education Provider' works against NUHEPs establishing a quality position in the market, as it sends a deficit message to the market. Therefore we would like to see the NUHEPs category renamed.

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

At a minimum, Insearch would like to see a new PCS for pathway colleges linked to universities. Depending on the numbers of HEPs in the new 'pathway' PCS, there is scope for this to be subdivided further into:

- pathway colleges that are controlled entities (as opposed to partners) of universities, and
- private pathway colleges.

Judging by the number of HEPs in each of the current PCS, it appears that the 'Australian University of Specialisation', 'Overseas Universities of Specialisation' and 'University Colleges' categories are largely redundant and should be eliminated. Insearch believes that there continues to be a place for the 'Overseas Universities' PCS, to distinguish these HEPs from 'Australian Universities'.

Discussion question 4: Do the specific categories need to be revised? How?
Discussion question 5: How would the needs of providers, students, industry, regulator and broader public interest be served by your suggested changes to the PCS?

Insearch believes that there could be an alternative form of accreditation for pathway colleges that are controlled entities of Universities. For example, if UTS took over Insearch's accreditation, this may demonstrate closer alignment to students and reduce the amount of oversight/resourcing required by TEQSA.

Please do not hesitate to contact Caroline Webb, Governance Manager at caroline.webb@insearch.edu.au if you need any further information.

Yours sincerely

Alex Murphy
Managing Director