

Provider category standards

The review of the Provider Category Standards had two main objectives:

- to confirm the meaning of *University* in Australia, with requirements for research, teaching and engagement, that would distinguish *Universities* from other providers; and
- determine a way to identify and recognise the more capable of the other higher education providers, as leading teaching focused institutions.

The review delivered on these objectives with its proposed tightening of the requirements to be a *university* and the proposal to create a category of *National Institutes* for the leading teaching focussed institutions, including university owned colleges. It also simplified the Standards overall reducing the number of formal categories.

The categories are about which organisations are permitted to offer higher education. They do not address funding issues which are a distinct question and not necessarily tied to the categories. The categories however can create ways in which to shape funding incentives into the future, as the Government comes to grip with the need to ensure that all Australians have post school qualifications, whether higher or vocational education.

The pressure ahead is clear. The main feeder cohort of young Australians is growing, due to the baby boom of the 2000s, and we now face the post COVID-19 challenge to reignite the economy in a safe and effective way.

The Minister for Education, Mr Tehan, largely endorsed the Review's proposals but with the unfortunate decision to rename the new *National institute* category as *University Colleges*, immediately maintaining the potential for confusing between a *University* and other providers.

Overview

The Higher Education Standard Panel's proposals to implement the Review outcomes, including the use of *University College* primarily do so sensibly.

However, its proposals for *University College* further blur the distinction that the review sought to create by allowing university like concepts of service and engagement to leach into the requirements for a *University College*. They push the *University College* grouping back towards an "almost university" set rather than a distinct group of good to excellent teaching focussed HE institutions.

The other main issue to explore in its proposals is whether and how to cater for the upfront creation of '*universities*' or '*university Colleges*'.

In summary the IRU:

1. supports the HESP's wording for:
 - *Institutes of Higher Education*,
 - *universities*, subject to points 3 and 4 below
 - specialised *universities*,

- overseas *universities*, and
- self accrediting authority;
- 2. recommends deletion of point 10 of the *University College* wording that would require civic leadership and community engagement. This is not necessary but optional for *University Colleges*;
- 3. recommends that there be no exemption of a new field of education from the research 30/50% test. *Universities* should ensure they maintain research effort sufficiently above the threshold not to require exemption of a new field;
- 4. supports the thrust of the approach to greenfield approvals:
 - the criteria set for a greenfield university in the making with placement within the *University College* category;
 - not having a formal *University College* in the making grouping but with capacity for *universities* to have related teaching focused institutes approved in this category; and
- 5. supports the proposed transition arrangements for existing higher education providers.

The proposals to implement the Review

1. Institute of higher education

The general group of higher education providers is to be known as *Institutes of Higher Education*. The Panel has inserted that a provider must offer at least one accredited course to prevent a notional registration or a one time active provider lingering in the system.

The IRU supports the proposed words.

2. *University College*

The titling *University College* undermines the Review aim to distinguish *Universities* from other providers. The IRU response works with this Ministerial decision, looking to minimise the risks from it. The Panel's words require that any *University College* using the label publicly must use both words together and never slide into *University*.

The grouping is meant to provide a space for the well established, non university, providers to show what they can do. This is anchored in the expectation of 5 years successful delivery. Interpretation of this requirement should be broad enough to include past performance by an establishing body such as a *University* where this can be shown to underpin the proposed *University College*.

The panel has inserted a requirement taken from the *University* definition that a *University College*:

“demonstrates strong civic leadership, engagement with its local and regional communities, and a commitment to social responsibility in the areas it offers courses of study”.

The Panel's rationale for this is that it meets “community expectation of a provider category that takes the word *university* in its name”.

This proposal further distracts a group that is meant to be the leading non universities with a university requirement due to the Minister's naming change. The result is to nudge the *University Colleges* that much closer to *University*. It could undermine the potential for the non university

providers to meet the requirements of *University College* where the focus is commercially provided education.

The requirement should not be part of the definition of a *University College*. This does not prevent a *university College* showing such characteristics – it merely avoids forcing them to do so.

Recommendation

Delete point 10 of the *University College* wording that would require civic leadership and community engagement.

3. Australian university category

There are several aspects in the discussion paper. The main proposed requirements follow the Review.

Main requirements

These incorporate the new civic leadership and community engagement requirement, as it was intended, to highlight the broader role of a *University*.

The IRU supports the wording

Specialised *universities*

The distinction of specialised to general *University* hangs off whether the institution operates in more than 2 broad fields of education. Once an institution reaches three it is considered a standard *University*.

The likely outcome is that most or all *Universities* will have many more than 2 fields so there will be a strong distinction between *University* to *Specialised University*.

The IRU supports the wording

Threshold research requirements

Research requirements target two areas, doctoral degrees and research. The expectation is that the university have both in in the greater of three or 50% of broad fields of education, with an initial test of the greater of three or 30% of fields for research for the first 10 years as a university to allow some space for initial development.

There is a provision that if a university enters a new broad field of education it could exclude this field from the count when assessing the 30% or 50%. This is an unnecessary complication, counter to the streamlined approach of the Review. A university that close to the threshold such that one extra field would be critical to falling below it should strengthen its research base first.

The IRU supports the wording but for the exemption when extending to a new broad field of education.

4. Overseas university

The requirements remain that TEQSA agrees that the institution has *University* standing in its home country and otherwise is consistent with the Australian expectations.

The IRU supports the wording

5. Self-accrediting authority

This section provides a simple guide to the essential issues including that the approval is either for all courses of any kind or defined to set fields and levels.

The IRU supports the wording

6. 'greenfield' Universities

The current standards make becoming a *University* a lengthy process, notionally involving becoming a standard provider, gaining self accrediting status, becoming a *University College* and then finally a *University*.

The reality that if a State or Commonwealth want a new *University* it would happen but it is not easily catered for in the Standards. The Review rightly recommended an option be available.

The HESP proposes that this be done through a subset of the *University College* group. These really would be *University Colleges*. As proposed, the institutions would need a strong starting capability, the likelihood of being a *University* after five years (with the reduced research threshold of 30% from that point), and be sponsored by an existing *University*.

The approach is the way several universities became *Universities* in the 1950s and 1960s such as James Cook University. It does not permit the start up from scratch of many IRU members in 60s and 70s such as Griffith and Murdoch.

The approach makes sense. Two questions emerge one of which the panel explores.

1. Is it better to place the greenfield within the *University* or *University College* category?

The effect of the *University College* proposal is to broaden out that category so it would include several experienced teaching focused institutions which do what they do well, with inexperienced developing institutions intended to become a full *University*.

The Panel is concerned that if a greenfield university were tucked under the *University* category and failed to develop as planned it would be hard to remove its *University* standing. Placing it within the *University College* category would allow one that fails to establish as a *University* to continue as a *University College*.

The issue is highly hypothetical - the number of greenfield *universities* is likely to be zero most of the time. Given the category is to be called *University College* the Panel approach carries weight.

2. Should a greenfield *University College* be possible?

The Panel asks this question – should an explicitly teaching focused institution with broad self-accrediting powers be able to set up as such and skip the five or so years or development as an *Institute of HE*.

- The risks of a failure are stronger for this than a new *University* – on basis that a greenfield *University* would have a lot of backing that would ensure that it gets to that outcome.
- It could undercut the effort of those now likely to be in this group to have established themselves and their credibility.
- It would be confused with the greenfield university in the making proposal – only one type of *University College* greenfield group is viable.

The Panel should consider making explicit that '*Universities*' may wish to set up related bodies as teaching institutes within the *University College* category, using the University's backing to demonstrate it has the capability expected.

The IRU:

- **supports criteria set for a greenfield university in the making with placement within the *University College* category;**
- **argues against a *University College* in the making grouping; and**
- **argues that the Standards ensure space for *universities* to have related elements accredited as *University Colleges*.**

7. Transition for existing providers

This in effect allows each current provider to work with TEQSA to be placed in the relevant future category.

IRU supports the proposed transition arrangements.

15 May 2020