

Professor Peter Coaldrake
Review of the Higher Education Provider Category Standards
Department of Education and Training

via: PCSReview@education.gov.au

13 March 2019

Dear Professor Coaldrake,

Re: Review of the Higher Education Provider Category Standards

The University of Canberra refers to the discussion paper on the *Review of the Higher Education Provider Category Standards* and welcomes the opportunity to provide feedback on this policy.

Central to this review, is the need to understand, and reaffirm what defines a *university* in Australia.

Australia has one of the best university systems in the world. The term ‘university’ is emblematic of the reputation for excellence that our higher education system enjoys. To an external audience, the term ‘Australian University’ represents the sum of the elements of all Australian universities – student-centric regulated high-quality research-informed higher education. It is well-understood and trusted.

In the absence of any compelling evidence for change, the University of Canberra strongly supports the maintenance of the category, ‘Australian University’ and its definition.

Attached is our submission, outlining some of the concerns that the University would like to raise regarding this matter.

Please do not hesitate to contact Ms Fiona Sutherland, Fiona.Sutherland@canberra.edu.au should the expert panel wish to discuss further.

Kind regards



Professor Leigh Sullivan

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Review of the Higher Education Provider Category Standards

Submission by University of Canberra

March 2019

The University of Canberra refers to the discussion paper on the *Review of the Higher Education Provider Category Standards* and welcomes the opportunity to comment.

This submission also references the related scoping study undertaken by the LH Martin Institute and the Melbourne Centre for the Study of Higher Education, University of Melbourne.

The University of Canberra acknowledges that the expansion of the Australian higher education sector and, particularly the increase in the number of non-university providers, has created a need to review provider categories to ensure their on-going suitability and relevance in supporting an evolving higher education system.

While this suggests a need to examine the definitions for institutions within the *Higher Education Provider* category, this is not something that this University feels sufficiently well-placed to comment.

Our comments will focus primarily on the need to understand and reaffirm what defines a *university* in Australia.

Australia's economy is rapidly evolving creating a heavier reliance on advanced knowledge, skills, ideas and innovation. Universities are central to this evolution, not only in curating knowledge and producing the graduates needed to drive change, but also in pushing the boundaries of knowledge through research and innovation.

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In the absence of any compelling evidence for change, the University of Canberra strongly supports the maintenance of the category, 'Australian University' and its definition.

The University of Canberra asserts that the current provider category, *Australian University*, is fit for purpose both now and for the future and should be preserved as a provider category.

The University of Canberra

The University was established by *the University of Canberra Act 1989* (ACT).

It is committed to serving the people of Canberra and the broader region through the delivery of professional and higher education and applied research.

The University of Canberra is ranked among top universities globally by both Times Higher Education (THE) and QS World University Rankings and appears in the 2019 THE rankings as one of the top 60 universities under the age of 50 years and one of the top 50 universities in the Asia-Pacific.

The University of Canberra's Strategic Plan 2018-2022, *Distinctive by Design*, provides an ambitious blueprint to position the organisation as a sector-leading university for the professions, guided by the principles of entrepreneurship, innovation, equity and diversity.

The University of Canberra has had long-standing excellence in both teaching and mission-oriented problem-solving research and continues to be influential in a range of areas including health and wellbeing, education, sport and environment.

Australian universities

The scoping paper notes that “the present definition of an Australian University and Australian University of Specialisation are likely meeting the needs of the current providers in those categories and adequately reflect their activity” (page 15).

The University of Canberra agrees.

Section B1.2 of the Threshold Standards clearly sets out the criteria for registration as an Australian University. These require Australian universities to deliver teaching and undertake research comprehensively across a minimum of three broad fields. Institutions must uphold a commitment to knowledge creation and dissemination. Australian universities are required by law to provide student services and support as well as engage with their communities and meet social responsibilities. Australian universities are self-accredited under TEQSA and must maintain quality and standards.

There are currently 40 providers across the nation that fulfil these criteria and hold the title of Australian University. Australian universities teach more than 1.2 million students and employ more than 100,000 staff in a given year.

International education is Australia’s largest services export. Australian universities are highly regarded and perform extremely well in international rankings. This has not been achieved by accident. It has been achieved through the efforts of our universities supported by robust internal and external quality assurance processes and mechanisms, including the regulatory requirements and responsibilities that flow from registration as an ‘Australian University’ as currently defined.

Teaching-research nexus

The discussion paper refers to the teaching-research nexus and the extent to which this is ingrained in university operations.

“Australia has come to conceptualise universities as places for both teaching and research. These two fundamental features have become synonymous with the title ‘university’ and have contributed to the good reputation of Australia’s universities internationally for high quality teaching and research.” (page 11)

Universities are the only institutions in Australia where the education they provide is informed by the latest research. As inferred by the discussion paper, this is what distinguishes universities from every other educational provider.

At the University of Canberra, the teaching-research nexus is central to our core mission. In its strategic plan, *Distinctive by Design*, the University of Canberra embraces this connection.

"Creating a continuum between research and teaching is critical to sustainable success of the academic mission of the University."

That universities are institutions where knowledge is created, not just shared, is a foundational principle that drives all that we do. In practice this is manifested through research; supervision of Higher Degree Research students; driving innovation; and supporting entrepreneurship. Universities look to advance the body of knowledge and solve problems, from local to global, and even universal.

The University of Canberra is proud of its highly qualified and high performing staff and is committed to nurturing the next generation of researchers through a strong cohort of Higher Degree Research students.

The changing nature of education and the student experience is also enabling researchers to work alongside students to create knowledge in new and innovative ways.

Student entrepreneurship is an example of how the University of Canberra creatively delivers research-informed teaching. The University of Canberra's curriculum is structured to offer entrepreneurship opportunities alongside work-integrated learning. From their first semester students commence placements with local entrepreneurs or even begin creating businesses of their own. Students are supported by the University to create innovative products and services and develop start-ups and businesses. This form of teaching has at its core a culture of research, inquiry and discovery.

At the University of Canberra the research-teaching nexus is real. Having one of the highest graduate overall employment rates in the country is part-testament to role that research plays in ensuring our graduates are instilled with the very latest knowledge and skills, much of which has been developed on campus.

All Australian universities must undertake both teaching and research. No teaching only higher education provider should be able to call itself a 'university'. This is not to say, however, that a new teaching only higher education category could not be created.

The University of Canberra also supports the preservation of the current requirement for Australian Universities to be comprehensive across multiple fields of education and research.

The University of Canberra encourages the panel to consider also including *innovation* and *entrepreneurship* into the Australian university provider standard.

Reputation and market signals

The discussion paper suggests that the Provider Category Standards serve as a market signal for quality and standards.

"Australia's robust quality assurance arrangements, including strict requirements to use the 'university' title, help to assure Australia's reputation globally for high quality higher education provision and delivery, safeguarding its strong reputation and international standing." (page 13)

The University of Canberra strongly agrees.

There is a need to uphold quality and standards around the use of the title 'university' and a need to consider the reputation of both individual institutions and the Australian Higher Education sector globally.

Similar assurances of quality and standards are not features of higher education systems in other countries. Apart from giving the Australian public confidence in the quality of Australia's universities, it also provides a comparative advantage as providers of international education.

The University of Canberra recognises the need to protect the title 'university' in Australia and opposes any suggestion to relax the criteria.

Diversity of Australian universities

Contrary to the claims by some, there is rich diversity amongst Australian universities. While some may focus on basic or pure research others, like the University of Canberra, focus on applied research aimed at resolving tangible problems. While some are aimed at enrolling the best and brightest from around the country, others emphasise creating opportunity for local and regional residents and those from disadvantaged backgrounds. While some adopt a heavily theoretical approach to learning, others incorporate more practical and work-related pedagogies. There is diversity amongst universities around labour market needs, course offerings, curriculum design and modes of delivery.

Each Australian University has a unique mission and community it serves. The University of Canberra is very different, for example, to the Australian National University, in terms of its mission, the role it plays in the local community, and its market.

This diversity amongst universities is supported by the existing Provider Category Standards and does not necessitate further classification within the Australian University category.

The University of Canberra is a young institution, having obtained the status of 'university' just under 30 years ago. The University of Canberra, like a number of others, was first established as a College of Advanced Education and has undergone much change and reform since that time in response to the evolution of the changes and needs of the community it serves. Young universities are one of the defining features of the current higher education ecosystem in Australia.

The University of Canberra encourages the Panel to acknowledge the history and evolution of universities particularly in relation to the role institutions play in their local communities.

The Panel is also encouraged to consider Provider Category Standards in the context of supporting young, successful universities in building capacity, including research capability that enriches and diversifies the national research endeavour and meets the specific needs of the communities it serves.