

## Navitas response to the Higher Education Standards Panel – Amending the Higher Education Standards Framework: Provider Category Standards

Navitas welcomes the opportunity to contribute to the consultations on the implementation of the recommendations of the Coaldrake Review of the Higher Education Provider Category Standards (PCS) via amendments to the Higher Education Standards Framework (HESF) being undertaken by the Higher Education Standards Panel (the Panel).

In presenting his recommendations to Government, Emeritus Professor Peter Coaldrake noted that:

*Underlying this Review is a cognisance of the changing nature of the Australian higher education landscape. Institutions will continue to evolve to meet different needs and pathways of students, burgeoning and shifting demand by industry, and new and innovative connections and partnerships among institutions, employers and communities. The PCS do not, and should not, inhibit our institutions from differentiating themselves and their missions in pursuing these opportunities and meeting these challenges.*

*The recommendations of this Report will enable opportunities to build the cachet of all higher education providers across the sector and support their aspirations and growth. In particular, the recommendations seek to boost the utility and recognition of categories and bolster requirements that support high quality higher education. Above all, the recommendations seek to protect both the interests of students as consumers, and Australia’s international reputation for higher education.<sup>1</sup>*

The Australian Government accepted the aim of all ten of the Coaldrake Review’s recommendations. Additionally, the Government proposed that the new *National Institute of Higher Education* category be re-named *University College*, while maintaining all the attributes and criteria recommended for that category by Professor Coaldrake.

### **Aspects of the proposed amendments supported by Navitas**

Navitas is supportive of the outcomes of the Coaldrake Review and the Australian Government’s subsequent response to the recommendations of the Review. We support:

- The simplification and rebalancing of the current categories, particularly increasing the number of categories that cater for higher education providers from one to two;
- The category title of *University College* and the criteria recommended by the Coaldrake Review for this category;

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<sup>1</sup> Page v, Final Report – Review of the Higher Education Provider Category Standards, available at <https://docs.education.gov.au/node/53071>, downloaded on 9 April 2020.

- The inclusion of the requirement to demonstrate industry engagement for the *University College* category;
- Provisions for 'greenfield' universities to support innovation, population growth and increased demand for higher education in the future; and
- The streamlining and simplification of the criteria for seeking Self-Accrediting Authority.

### **Aspects of the proposed amendments not supported by Navitas**

Navitas is strongly opposed to the Panel's proposal to apply the following criterion to the *University College* category:

- 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.

Navitas believes it is not reasonable or appropriate to apply this additional criterion to the *University College* category because:

- Neither the Coaldrake Review nor the Government's official response to the Review recommended that this criterion be applied to this category of providers.
  - The application of this additional criterion for *University College* being proposed by the Panel runs counter to the spirit and letter of the Coaldrake Review.
  - Under the current PCS, the *Australian University College* category is a transitional category for a higher education provider with realistic and achievable plans to become an *Australian University* within five years. The Coaldrake Review and the sector as a whole recognised that the category is underutilised and there are many reasons for it to be abolished. The proposed additional criterion increases the unattainability and reduces the fit-for-purpose utility of the category – something the Coaldrake Review explicitly sought to remedy.

If the Panel proceeds with adopting the criterion – which we strongly argue against – it would require substantial additional consultation with respect to the specifics of the criterion. Given that this was not contemplated by the Coaldrake Review or the Government's response, the sector needs further opportunity to discuss, debate, define and contextualise the requirements so that they are appropriate for all provider types.

### **Submitted by Navitas Pty Ltd.**

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