Submission to the Department of Education, Science and Training
regarding
Building University Diversity Issues Paper

April 2005
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Executive summary

Holmesglen Institute of TAFE is supportive of the proposal to review the National Protocols for Higher Education Approval Processes with a view to increasing diversity in the tertiary education sector. Holmesglen’s position is to argue for a wider definition to be applied to the higher education sector to include all forms of post compulsory education, including vocational education and training (VET).

A number of drivers for change were identified as illustrating why a review of the National Protocols should be conducted and what areas need to be targeted in such a review. In the submission, Holmesglen argues that should a wider range of institutions be allowed to operate in Australia as universities, problematic issues could be addressed such as access to higher education for disadvantaged students, structural inflexibilities in current universities and disparities between providers in the higher education sector. Additionally, it could also ensure that principles upheld in the Protocols are applied more rigorously to existing institutions.

Finally, Holmesglen Institute of TAFE proposes a revised model of the Australian tertiary education sector, which takes a holistic view of the delivery of higher education in Australia. A new type of institution, the “University College”, is proposed, in which applied and professional learning would be delivered to a diverse student body, while maintaining high scholarship and teaching standards, educational integrity and a high standard of customer service.
Preamble

Holmesglen Institute of TAFE welcomes the opportunity to make a submission to the Department on the issues raised in the paper Building University Diversity: Future approval and accreditation processes for Australian higher education.

Holmesglen Institute of TAFE is one of the largest TAFE providers in Victoria. In 2004, Holmesglen delivered 10.6 million student contact hours to over 50,000 enrolled students. Holmesglen offers courses across the areas of applied and health sciences, building and construction, business and administration, creative arts, engineering, electrical and electronics, furnishing, decorating and design, health, human and community services, horticulture, hospitality, tourism and recreation, information technology, and languages and general education. Courses are offered across a range of qualification levels, from Certificates I-IV, to Diploma, Advanced Diploma and Graduate Certificate level. Holmesglen is also a private higher education provider and offers two Bachelor Degree courses, with a third in the process of being accredited.

Holmesglen is an affiliate institution of Charles Sturt University and offers a number of their degrees in Melbourne. University Transfer Programs are also offered with Monash and Deakin Universities.

Holmesglen operates across three campuses and also maintains a substantial student services unit, runs adult short courses, and supplies a number of services to industry.

The majority of Holmesglen’s students are part-time, and the Institute has a large number of international students. It operates seven days a week and employs around 735 teaching staff.

1 Introduction

While many of the points raised in the Issues Paper are valuable, and the ensuing discussion will contribute to the development of a more diverse higher education sector, Holmesglen Institute was disappointed that the Issues Paper did not discuss educational issues more fully, although it examined structural issues in an in-depth fashion. It was disappointing also, that the paper made only passing reference to the TAFE sector, and indeed to vocational and educational training (VET) as a whole. It is the Institute’s position that changes in the higher education sector must be premised on educational values, the benefits of these to students and the outcomes to Australian society as a whole and that VET can contribute to these outcomes.

Holmesglen notes that the paper made wide use of the term “higher education”, without defining what the sector entails. Holmesglen’s position is that “higher education” is a confusing concept, given that in Australia, it has become a de facto term for the university sector. As the focus of the Issues Paper lies in developing ways in which to open the higher education sector to more participants, perhaps a preferable terminology to use would be “tertiary education”, to distinguish it from the compulsory forms of primary and secondary education. This term includes any post-compulsory education undertaken, including VET. In the course of this submission, the use of the term “higher education” will encompass this latter meaning.

This submission will take the following format: Section 2 will outline reasons why Holmesglen Institute believes there is a case for a review of the National Protocols. Section 3 will address the questions for discussion raised in the Issues Paper. Section 4 will present Holmesglen’s proposed model for the tertiary education sector.
2 Drivers for change in the higher education sector

The current state of the higher education sector, and specifically the university sector, gives rise to a number of areas in which reform is desirable and would in fact benefit many areas of Australian society. These areas and the reasons why change is desirable will be outlined below.

The current (undergraduate) university structure in many ways limits access for some groups in society. Year 12 (VCE in Victoria) in the secondary system is essentially designed for university entrance, yet in Victoria, fewer than half of the students who complete VCE actually proceed to university\(^1\). Undergraduate programs cater primarily for post-Year 12 full-time students only, with little or no capacity for provision of undergraduate delivery to part-time students. Prospective students already in the workforce have limited opportunity to study at undergraduate level in Australian universities. These structural rigidities in undergraduate university provision have serious implications for people’s pathways from school, through to higher education and the workforce.

Links into university study for any other than existing full time students are underdeveloped. For many years there has been a demand for pathways into university from TAFE. It is not an exaggeration to say that despite the millions of dollars spent on attempts to develop pathways and access, the university sector has failed to respond. Alternative ways to tackle this issue are discussed later in this paper.

Diversity in the university sector could also increase access to tertiary/higher education for a broader cohort of students. In particular, students from socially disadvantaged groups have low levels of participation in conventional higher education. The following table shows the proportions of particular disadvantaged groups in higher education and in VET. The table shows that there are much lower percentages of socially disadvantaged groups participating in higher education than there are in VET.

Table 1 Comparison of disadvantaged groups’ participation in higher education and VET

<table>
<thead>
<tr>
<th>Equity groups</th>
<th>Higher education</th>
<th>VET</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aboriginal/Torres Strait Islanders</td>
<td>1.3</td>
<td>3.3</td>
</tr>
<tr>
<td>NESB</td>
<td>3.8</td>
<td>19.7</td>
</tr>
<tr>
<td>With disability</td>
<td>3.3</td>
<td>3.9</td>
</tr>
<tr>
<td>Rural</td>
<td>18.6</td>
<td>30.0</td>
</tr>
<tr>
<td>Remote</td>
<td>0.2</td>
<td>3.7</td>
</tr>
<tr>
<td>Low economic status</td>
<td>15.3</td>
<td>25.0</td>
</tr>
</tbody>
</table>

Source Karmel and Nguyen (2003)

Table 1 shows that the university sector is lagging behind VET in terms of broadened access to tertiary education for socially disadvantaged groups.

Universities themselves tend to be similar across jurisdictions and the predominance of a single-model modern Australian university is acknowledged in the Issues Paper (Sections 4.10-4.11). With the demise of the CAEs in the early 1990s however, there has been a move away from specific vocationally oriented degrees to general one-size-fits-all degrees being offered at undergraduate level. There is a lack of applied educational qualifications offered at undergraduate level (aside from the traditional areas of law, medicine, dentistry and so forth).

\(^1\) One study found that 40.8 percent of those who had completed VCE in 2002 proceeded to university. The study noted that nearly three-quarters of the Year 12 students in 2002 applied for a tertiary place (includes university and VET). Aspirations for tertiary study (as well as acceptance of offers) differed according to school type, however (Teese, Polesol and Mason 2004).
and it is Holmesglen’s position that this is evidence of a lack of diversity in universities and a sign that the parameters need to be broadened in this area. In the same vein, universities tend to lack flexibility in course structures, so that an all-or-nothing approach is taken in regard to students completing courses. These inflexibilities in the university course and model structure are further grounds for arguing for changes in the higher education sector.

Diversity in the university sector should be pursued, not only for the reasons outlined above regarding university entrance and exit and course content, but also because there are grounds for questioning whether the National Protocols are in fact functioning to ensure that the standards they enshrine are being maintained. It is Holmesglen’s position that there needs to be greater scrutiny of the system itself and the way in which it assures the outcomes of existing institutions. The key question here is whether the existing universities are achieving and/or fulfilling their obligations under the existing protocols. In some cases, specific aspects of the protocols seem to be ignored, in particular regarding the obligation of all universities to have their staff engaging in research activities alongside teaching (for example, Central Queensland University has large numbers of teaching-only staff), as well as the requirement for universities to be financially stable and solvent (the University of Newcastle and RMIT University).

In addition, many universities are delivering what have traditionally been seen as VET qualifications. This will have an impact on the demand for the same courses being offered at TAFE institutes. University status gives an institution many advantages over others in the tertiary education sector. One such advantage relates to self accreditation. Universities are able to develop Diploma courses that do not necessarily comply with VET accreditation principles, a luxury that their TAFE institute competitors cannot indulge in. This gives the universities an unfair advantage over nearly all other institutions in the Australian tertiary education sector.

This last point illustrates the uneven playing field that characterises the current tertiary education sector in Australia. Self accrediting universities enjoy an autonomy which allows them to introduce courses that may intrude into the VET sector. TAFE Institutes, unable to manage their own fees and affairs in the same way universities do, are thus placed at a disadvantage in offering the same course content (NCVER 1998). These points again indicate the benefit of allowing greater diversity in the higher education sector.

Holmesglen has identified a number of other points that support reform of the Protocols. The most important of these is probably that the undergraduate student has a right to expect high quality teaching at a higher education institution. Arguably, not all Australian university courses guarantee that level of high quality teaching. Many institutions, it can be argued, pursue number of enrolments over developing the quality of their teaching. The next point is that increased competition in the university sector may well lead to better management of universities.

Finally, removal of the necessity for a university to conduct both teaching and research could assist institutions that are now undertaking research simply to retain their university status. Freeing up these institutions from research obligations could allow them to concentrate their efforts on other areas, for example, allowing more flexible entry, assuring greater access for a wider range of students or improving levels of teaching.

### 3 Responses to Questions for Discussion

This section will outline Holmesglen’s response to the questions for discussion posed in the Issues Paper.

**(a)** Given the changed environment for higher education in Australia and globally, is there a need to accommodate a broader range of institutions in the National Protocol?
Holmesglen Institute believes that one of the weakest points of the Issues Paper lies in this argument. The changed environment alone is not a reason for change. While Holmesglen’s position is to argue for reforms to the National Protocols to encompass a broader range of higher education institutions, the impetus for this reform should arise from a concern for the benefit to Australian society, a move to include vocational, professional and applied learning in the higher education sector and the right of students to have their aspirations for high quality education met. Concomitantly, wider access to higher education for a diverse student population will develop. These factors, rather than international trends, should drive the reform of the National Protocols.

(i) *What should the range of institutions be and what should they be called?*

Holmesglen’s proposed model for the higher education sector will follow in this submission.

(ii) *Would specifically providing for teaching and research intensive institutions lead to greater diversity?*

Holmesglen believes that it would.

(iii) *If so, what criteria should be set so that the quality of outcomes is appropriate in whatever institutions are approved?*

Holmesglen believes that the criteria should include size, scope and scale of institutions, quality of teaching (measured in terms of staff-student ratios and qualifications of teaching staff) and financial stability. A more detailed discussion of the parameters for new institutions follows in Section 4. Additionally, institutions would need their university status reviewed regularly and audited by a body such as AUQA.

(iv) *Are further criteria required in the Protocols to better assure the quality of the higher education system?*

Holmesglen’s position is that as the current Protocols are not working (as outlined in Section 2 above), further criteria are required, and must be enforced.

(b) *Should the National Protocols accommodate specialised institutions?*

Holmesglen’s position is to argue that specialised institutions should be accommodated. The following section will outline the type of institutions envisaged.

(c) *Should the National Protocols provide for different ways of regulating private and for-profit higher educational institutions and, if so, on what basis?*

Holmesglen’s position is that, as it stands, separate governance and financial arrangements should be implemented, in line with the observations in the Guthrie report quoted in Section 4.36 of the Issues Paper. Consumer protection is vital and the size and scale of traditional-type universities should ensure academic freedom. In smaller, more specialised universities however, students may be disadvantaged.

Private universities would need to prove their financial sustainability. For-profit institutions would need to demonstrate how their core educational values could be assured. They would need an independent board/council to ensure academic freedom is pursued. This board would need to ensure that the pursuit of education rather than profit is the aim of the institution.

In the long term, if the revised Protocols state the ground rules however, then there is no reason why public and private providers should be separately regulated. The new Protocols would need to address governance, educational mission and financial arrangements. Auditing needs to occur across the board if Protocols are reformed.
(d) Should a higher education institution that has demonstrated over time its capacity to achieve reaccreditation of its courses be able to seek authorisation to accredit its own courses?

Holmesglen’s position is that they should be able to.

(e) What nomenclature would be appropriate to designate the different types of institutions within a restructure National Protocols?

Holmesglen’s position will be outlined in the section below.

(i) If the Protocols were restructured to provide for greater diversity of institutional types, how should existing institutions be treated?

Holmesglen’s position is that existing institutions should be reviewed.

4 What would the new sector look like?

Holmesglen Institute would like to suggest a model for the higher education sector that could be considered when and if the National Protocols are revised. This model is a holistic view of how all forms of post-compulsory, or tertiary education could be incorporated in a single model that will maximise the educational opportunities and returns to all students in Australia.

The model includes five different types of higher education institution and introduces the notion of a “University College” institution, which would include a broad range of educational programs and pathways. This notion will be discussed in more detail below. Initially, the five types of institutions will be introduced in Table 2 below.

Table 2 Proposed model of the tertiary education sector

<table>
<thead>
<tr>
<th>Institution type</th>
<th>Characteristics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Higher education provider Type I</td>
<td>Non-self accrediting</td>
</tr>
<tr>
<td></td>
<td>Narrow focus of study/discipline</td>
</tr>
<tr>
<td></td>
<td>Small in size</td>
</tr>
<tr>
<td></td>
<td>Limited financial capabilities</td>
</tr>
<tr>
<td></td>
<td>Eg Australian Institute of Management</td>
</tr>
<tr>
<td>Higher education provider Type II</td>
<td>Self accrediting</td>
</tr>
<tr>
<td></td>
<td>Narrow focus of study/discipline</td>
</tr>
<tr>
<td></td>
<td>Limited financial capabilities</td>
</tr>
<tr>
<td></td>
<td>Eg Australian Film Television and Radio School</td>
</tr>
<tr>
<td>TAFE Institute</td>
<td>Non-self accrediting</td>
</tr>
<tr>
<td></td>
<td>Offers Advanced Diploma programs and under</td>
</tr>
<tr>
<td></td>
<td>Broader range of study/disciplines</td>
</tr>
<tr>
<td></td>
<td>70% of funding from the Government</td>
</tr>
<tr>
<td></td>
<td>Eg Many existing TAFE Institutes</td>
</tr>
<tr>
<td>University College</td>
<td>Non self-accrediting</td>
</tr>
</tbody>
</table>
| University Type I (Typical existing university) | Self accrediting  
Conducts research and teaching  
Offers all course levels to Doctorate  
Financially stable  
Characterised by a culturally, socially and economically homogenous student population |
| University Type II (Existing university but refocused on teaching and scholarship) | Self accrediting  
Financially sound  
Increasingly diversified student population  
Offers scholarship and teaching with applied vocational outcomes |

The University College model proposed above is a new type of higher education institution which requires a further narrative description. The University College would provide a broad range of vocationally focused programs from Certificate level, to Diploma and Associate Degree level, as well as undergraduate degree level. Each program would have occupational outcomes as well as further study opportunities or outcomes. This type of institution would offer options to students that simply are not available today, as well as boasting a broad student cohort.

Holmesglen Institute currently has a degree course, the Bachelor of Applied Science (Built Environment), in the process of attaining accreditation. In Holmesglen’s view, this course illustrates the type of options and pathways that a degree from a University College would provide. Figure 1 below shows the course structure and the course options available to students.
Figure 1 Proposed structure of Holmesglen Bachelor of Applied Science (Built Environment) Degree

- Certificate III (pre-apprenticeship) + 8 years industry experience**
- Diploma of Building Studies
- Year 2
- Year 3 - Bachelor of Applied Science (Built Environment)
- B. Built Env (Building Surveying)
- B. Built Env (Housing)
- B. Built Env (Property)

* Student can enter from Yr 12
** Student can enter course with industry experience and receive advanced standing

See over page for further explanation
The proposed degree structure above illustrates the type of pathways that a University College would offer. The Degree course can be entered post-VCE, or by completing Certificates III and IV. The basic Bachelor Degree can be extended by a fourth year to include one of three specialisations and lead to the award of a second degree. The degree has multiple entry points (at pre-apprenticeship level, post-VCE level and at Diploma level which gives 12 months advanced standing). Exit points are also available for students not wishing to complete the full 4 years of the specialised degree (at Diploma level and at the Bachelor of Applied Science) level. The flexibility in entry and exit to this course is an aspect that is lacking in the typical university course structure today.

Further characteristics of the University College would be that the institution would be non self-accrediting, but would have the potential to work towards self accreditation status over some years of operation. In Holmesglen’s model outlined above, the University College would thus have the potential to progress to University Type II status.

All staff at the University College would be required to have teacher training qualifications. The Issues Paper makes frequent reference to the concern that the current university paradigm and structures do not allow for the development of high quality teaching. The Issues Paper put forward the suggestion that high quality teaching and scholarship could be a basis for an institution to be allowed university status (Sections 4.26-4.27). Holmesglen Institute supports the approach of allowing for flexibility in the tertiary education sector by elevating the status of teaching. There would be an emphasis in the new University College model on high quality teaching and scholarship, with teaching staff required to ensure they were up to date with new knowledge in their areas of expertise. Low student-staff ratios would be a further aspect of high quality teaching to be maintained.

The University College would also need to have a minimum number of students. Size and scale of the institution is important because of the perceived status that comes with quality of facilities, the capabilities required to meeting diverse student needs and the capacity to cater for a diverse range of students. There would need to be at least 10,000 EFT students, with substantial numbers enrolled in tertiary education courses (Diploma level and above). Courses would need to be offered over at least three broad fields of study or disciplines. This would ensure the requisite depth of program provision expected from a higher education institution.

To support the substantial student numbers, the university college would be required to have high quality services for their students to support their study. These services would need to include student services, libraries, on-campus IT facilities, grievance procedures and so forth.

The University College would need to have a significant international focus, but international students would not be the majority of students. As the Australian domestic market is comparatively small, the University College would also need to have the capacity to become active in the international marketplace to ensure its long-term growth and diversification.

The University College would need to have a strong industry, educational and vocational focus in its governance arrangements. A mix of public and private ownership would assist the University College in achieving its aims. It would also need to uphold educational integrity, and to ensure educational independence from its shareholders. Finally, the University College would need to demonstrate financial capability over a number of years in order to maintain its status, as indeed would all tertiary education providers.

5 Conclusion

Holmesglen Institute of TAFE was pleased to prepare this submission to the Department of Education, Science and Training and to contribute to the national discussion of the nature of higher education and university diversity. The review of the National Protocols on universities is to be welcomed provided that the diversity in the higher education sector that follows does in fact contribute an overall benefit to Australian society. Should the definition of higher
education be revisited to include all forms of post-compulsory education and not just the conventional university sector, it is Holmesglen Institute’s position that much greater educational opportunities will be made available to Australian students.

The University College model described at length in this paper, is one way in which a greater range of students could be accommodated in the higher education sector, in a more flexible and focused manner than is the case today. The combination of high-quality teaching, vocationally focused outcomes and pathways to further education or employment that are offered by the model addresses many of the issues identified earlier in this paper as drivers for the review of the National Protocols.

Holmesglen encourages the Department to consider the model of the University College as one way in which diversity and range of choice could be introduced to the Australian higher education sector and to those the sector is designed to benefit most, the students.
References


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