Response to the Joint Committee on Higher Education’s draft *National Guidelines for Higher Education Approval Processes*

6 March 2007
1 Introduction

Holmesglen Institute of TAFE welcomes the opportunity to make a response to the Joint Committee on Higher Education concerning the draft National Guidelines for Higher Education Approval Processes.

Holmesglen supports the way the National Protocols provide pathways for institutions wishing to change the nature of their operations. From the outset however, Holmesglen would like to emphasise that it is disappointed that the new National Protocols maintain the definition of a “university” to be essentially as it currently exists.

The assumption throughout the draft Guidelines is that all tertiary education institutions aspire to achieving “university” status as it exists today. While Holmesglen welcomes the initiative of allowing for higher education providers to apply for self-accrediting status, it is ultimately disappointing that “university” status remains protected and continues to denote the most desirable form of tertiary education, at the expense of other institutions that wish to pursue excellence in education without complying with the onerous requirements of research.

In this response, Holmesglen will not consider the Guidelines for overseas higher education institutions seeking to operate in Australia.

2 Guidelines for the registration of non self-accrediting higher education institutions and the accreditation of their courses

Holmesglen believes that the requirement for non self-accrediting providers of higher education to be members of an approved Tuition Assurance Scheme is inappropriate in the case of large, established institutions such as TAFE institutes in Victoria. While we believe in the primacy of safeguarding students’ rights and the interests of students, the fact is that TAFE providers in Victoria are very different in nature to many of the private higher education providers financially, structurally and in terms of governance.

Holmesglen has put forward its position on this matter to the State Government of Victoria in relation to TAFE applications for Higher Education Provider status under the Higher Education Support Act.

As Table A providers, universities are distinguished by their status as public institutions. So too should TAFE providers be acknowledged as being public institutions. Public providers have very much lower levels of risk associated with their delivery than many private providers. Victorian TAFE institutes are

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also subject to rigorous financial performance monitoring by the state government and the Auditor-General annually.

A second point concerning the draft Guidelines is that of terminology. While the Guidelines themselves make no mention of specifics and it is up to the State Accrediting Authorities to set their own guidelines for annual report formats, the information to be submitted annually would be better termed “Annual Data Collection” or similar, as our institution already submits an Annual Report to the Victorian Parliament. Holmesglen does not believe that this annual data submission should be called an Annual.

3 Guidelines for awarding self-accrediting authority to higher education institutions other than universities

Holmesglen is broadly supportive of the specific requirements for self-accrediting authority outlined in these draft Guidelines (Heading 10 section D20). Two areas are of specific concern however. The first of these is the “benchmarking” activity that is referred to in Requirements 10.7 and 10.9. The “suggested evidence to be provided” that follows these requirements also makes reference to “benchmarking of key scholarship indicators/key course and teaching and learning indicators against existing self-accrediting institutions”.

Given that there are no comparable self-accrediting higher education non-university providers currently in existence, Holmesglen would like to clarify whether it is the Joint Committee on Higher Education’s intention to provide indicators that an institution would need to benchmark itself against. We would expect to be informed of how the benchmark levels would be established. Holmesglen’s expectation is that these would be open to sector discussion and/or review.

While benchmarking in terms of student outcomes and course experience is possible, it is unlikely that many areas in which existing universities undertake benchmarking would be relevant to many non self-accrediting providers. This is partly a matter of institution size and also one of scope or breadth.

This relates to a second concern Holmesglen holds about these draft Guidelines. The Guidelines make reference consistently to an “institution” and in fact some of the requirements specified (for example 10.2 and 10.3) make reference to indicators that are institution-wide, for example “financial capacity” and “governance and decision-making arrangements of the institution”. Holmesglen, as an existing VET provider, would prefer to see a reference to, if relevant, “institution or higher education division” in these requirements and some clarification of which requirements would need to be demonstrated institution-wide and which would need to be demonstrated in the higher education division only.

These requirements (Heading 10 Section D20) also make reference to “scholarship”. Holmesglen notes with interest the definition of “scholarship” in
relation to teaching and learning that accompanies these draft Guidelines. The definition of scholarship combines both staff-centred and student-centred outcomes, which is commendable. The draft Guidelines suggest that benchmarking of “key scholarship indicators” may need to be provided by institutions seeking self-accrediting status.

While it would be feasible to measure quantitatively academic staff’s professional practice for example, it would be far more difficult to measure staff’s focus on the learning outcomes of students, which is a pedagogical issue. The other pedagogical aspect in the definition of scholarship (“encouraging students to be critical creative thinkers and enhancing teaching understanding through interaction with students”) is double-barrelled. This is because creative, critical thinking development in students can be measured through, for example, the Course Experience Questionnaire, whereas teachers’ enhancement of teaching through their interaction with students is not a measurable aspect, although professional development could certainly provide avenues for reflection on it.

4 Guidelines for establishing Australian universities

Holmesglen’s view on the diversity offered by these Guidelines has previously been outlined. While the National Protocols allow for three types of university, these Guidelines do not make apparent the diversity implied by the Protocols.

In particular it is not clear whether the “university college” title is one which can be held in perpetuity or whether the Protocols require such an institution to move, ipso facto, to the unmodified university title. Furthermore, if such an institution were not to move to the unmodified university title (whether by choice or by not attaining approval), would it not also qualify for the requirements of a “specialised university” (as it would be offering research Masters and PhDs in one broad field of study)? In such a case, the Guidelines do not clarify sufficiently the difference between a specialised university and a university college. Is it the case that only the intention of the institution is the defining factor in the division between these two types of university?

As a second point, Holmesglen would like to emphasise that the defining nature of a university may not be solely its field of study, as allowed for in the “modified university title for a specialised university” criteria. It may be in the pedagogical approach of the university; for example it may be a university of applied education or a university of technology as is/was the case with Swinburne University of Technology and Victoria University (formerly VUT). It would seem that the Guidelines do not allow for this type of specialisation.

If the intention of the Protocols is to allow universities to be specialised in areas other than explicit disciplines, then this needs to be made clear. If this is not the case, the term “discipline” or “field of study” should be used in place of “specialisation”. A specialised pedagogical approach is as much a specialisation as a discipline area. The draft Guidelines need to clarify how
the specialisation is to be denoted, as using a field of study term would be misleading in many cases. For example, a theological university could not legitimately call itself a “University of Society and Culture”, even though its higher education qualifications may fall in to this field of study.

Recommendations

- That the Guidelines for the registration of non self-accrediting higher education institutions and the accreditation of their courses waive the requirement to belong to a Tuition Assurance Scheme for government-owned public educational institutions such as TAFE institutes.

- That in place of “Annual Reports”, the Guidelines for the registration of non self-accrediting higher education institutions and the accreditation of their courses make reference to “annual data reporting”.

- That the JCHE make available key performance indicators it would wish to see non self-accrediting higher education providers benchmark themselves against and make it clear how these were derived or alternatively that these benchmarks are written into the Guidelines for awarding self-accrediting authority to higher education institutions other than universities.

- That the Guidelines for awarding self-accrediting authority to higher education institutions other than universities specify which requirements apply only to higher education divisions of larger institutions delivering VET and higher education programs, and also which requirements are to be met institution-wide.

- That the definition of “scholarship” used throughout the Guidelines includes items that can be measured empirically only.

- That the Guidelines for establishing Australian universities clearly differentiate between the requirements for a “University college” and a specialised university.

- That the Guidelines for establishing Australian universities clarify whether the modified university title for a specialised institution can only be approved on the grounds of discipline, or whether it may also be extended on the basis of pedagogical approach.

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