Executive summary and priorities for action – Building University Diversity

The points below summarise arguments and proposals which are contained within RMIT's submission.

1. RMIT supports increased diversity of providers where such diversity is directed towards the achievement of desirable outcomes. Desirable outcomes of institutional diversity might include:
   - diversity of qualifications to meet labor market needs and to equip citizens to participate in a transforming world;
   - expansion of flexible, transparent pathways between qualifications and between providers, in Australia and internationally;
   - increased educational opportunities and choice for students (in terms of what is offered, where and how); and
   - increased economic, social and cultural benefits to Australia through effective participation in an internationalised higher education and research environment.

2. RMIT supports consistent quality assurance requirements (in terms of quality, accountability and fairness) for all providers in receipt of public funds, consistent with their mission and designation, in order to
   - Minimize risk in relation to the disbursement of public funds
   - Provide greater certainty to students and other stakeholder/clients about the education and research services to be delivered
   - Protect the 'public interest' in higher education provision
   - Facilitate pathways and recognition of prior learning between diverse higher education institutions, and their harmonisation with international qualifications frameworks (such as the Bologna framework in Europe).
   - Maintain and enhance the reputation and integrity of the Australian post-secondary education sector in particular the higher education sector.

3. RMIT supports moves to create a national framework for accreditation and regulation of higher education providers, in order to
   - Support consistent application of the protocols
   - Support the capacity of non-self accrediting providers to operate across State and Territory borders
   - Support a consistent and rigorous quality assurance framework for higher education delivered by a diverse range of providers.
   - Support the commitment to broadening opportunities for all Australians who aspire to participation in higher education.

4. RMIT does not believe that there is a compelling case for changing Protocol 1 in ways which fundamentally alter the present criteria for recognition as a university. Consideration of any such change should be informed by a
comprehensive risk analysis. However, we do support clarification of some aspects of the criteria, and national consistency in their application as detailed in our submission. We also support exploration of other mechanisms whereby university diversity can be encouraged; for example through greater flexibility within funding agreements and a range of incentives within Commonwealth funding mechanisms for education and research which encourage diversity of provision and activity. These might include, for example, supporting dual sector qualifications.

5. RMIT supports the inclusion of information within the protocols which assists institutions wishing to know what steps must be taken in order to change their designation (eg from non self-accrediting to self-accrediting and from self-accrediting to university). This is another mechanism whereby diversity can be actively encouraged.
Introduction

RMIT welcomes this opportunity to contribute to the discussion of diversity within Australian higher education, and to comment on the efficacy of the MCEETYA protocols in supporting this diversity. This submission is framed around some of the specific questions set out in the Discussion Paper, *Building University Diversity*, but goes beyond the scope of those questions to address other relevant matters. It supports the arguments made in the Australian Technology Network submission while offering some new and complementary perspectives on the discussion.

1. Given the changed environment for higher education in Australia and globally, is there a need to accommodate a broader range of institutions within the National Protocols?

‘Diversity’ is not an end in itself. Any action to increase diversity among Australian universities or Australian higher education providers more generally should be premised on clear and desirable outcomes. RMIT suggests that, given the Minister’s aspirations for a “a confident, strong, high quality sector that plays a vital role in or economic, cultural and social development”¹, the following aspects of diversity are relevant:

- diversity of qualifications to meet labour market needs and to equip citizens to participate in a transforming world;
- expansion of flexible, transparent pathways between qualifications and between providers, in Australia and internationally;
- increased educational opportunities and choice for students (in terms of what is offered, where and how); and
- increased economic, social and cultural benefits to Australia through effective participation in an internationalised higher education and research environment.

RMIT believes that such objectives provide a useful lens through which to examine the question of diversity. Measures to increase the number and type of higher education providers should therefore be assessed against their capacity to support these objectives. Competition is welcome, insofar as it can promote improved responsiveness and efficiencies among providers; but encouragement of measures to increase competition should depend on the extent to which they support the national interest in higher education provision.

As to whether there is a need to accommodate a broader range of institutions within the National Protocols, RMIT notes that the Protocols currently allow for a diverse range of providers to be recognised through State and Territory regulatory authorities. In addition to self-accrediting institutions, there are almost 200 non-self-accrediting providers recognised through these authorities. As Attachment 1 shows, they are diverse in disciplinary offerings, diverse in scale and diverse in the range of qualifications offered. This diversity is set to increase, partly through State governments' encouragement of more cross-sectoral provision (e.g. through allowing Victorian TAFE colleges to offer higher education programs regulated through State Departments) and through the provisions of the Higher Education Support Act (HESA), which enable the


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Minister to recognise such institutions for the purpose of allowing their students to access an income contingent loan (FEE-HELP).

However, in a more competitive, market oriented environment, there is a converse need to ensure that accreditation practices – in relation to both institutions and courses – remain robust. The maintenance of quality 'base lines' is extremely important, not just in terms of providing assurance to students and funding agencies, but to facilitate the development of flexible pathways between providers based on mutual recognition of qualifications. The Australian Quality Training Framework (AQTF) and the Australian Universities Quality Agency (AUQA) have significant roles in assuring the quality of the post-secondary sector overall.

Also, the way in which the protocols are enacted may well be limiting diversity in provision across State and Territory borders. Protocols are enacted under different jurisdictions, and only universities are entitled to automatic cross-border provision. The need to apply for accreditation across different jurisdictions may operate as a disincentive to new providers entering the market. In this respect, RMIT supports the Guthrie Report's calls for a review of the extent to which the Protocols are consistently enacted across jurisdictions, and its proposals for moves towards a national accreditation framework and authority to assess applications for institutional accreditation.

2. Should the National Protocols accommodate specialised institutions? Should such institutions be called universities or should they have a separate title?

As described above, the Protocols do indeed accommodate a range of "specialised" institutions. It is important in this respect to distinguish between higher education providers generally and the significant subset designated universities. While there are few explicit restrictions on the types of provider which may be recognised, there are significant restrictions on those that can be called universities.

Since 2000, Protocol 1 has defined the criteria which institutions must meet to be granted university status. It draws on past and present understandings of what a university must be. It does not capture all the attributes that might be ascribed to a university – for example, a commitment to community service or to meeting the educational needs of particular regions – and it is easy to find examples of universities overseas which do not meet all these criteria. Similarly, it is possible to find examples of higher education providers that are not universities but have some of the characteristics described in the Protocol. None of this renders the Protocol invalid – but it does underline the ongoing contestability around definitions of 'university'.

Therefore, we need to examine what is to be gained from changing Protocol 1. The title 'university' carries an obvious 'brand advantage', not least because universities are historically associated with higher education at its most elite and privileged level. This association is of course changing as more students are admitted to universities. At RMIT successful access schemes focus on community development and aligning the aspirations of individuals with their talents and the opportunities available to them. The community engagement obligations of universities, which form part of the community's expectations, are not necessarily shared by other higher education providers.

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Brand advantage also reflects the very real benefits of a university education, which includes access to a wide range of disciplines and an institutional culture informed by research and scholarship. Even in countries where so-called 'teaching only' universities are recognised, reputable universities capture research activity and research culture. For example, prestigious, specialist, undergraduate colleges in the US such as Vassar include research training in undergraduate education, and promote the scholarship and research activity of their staff. In the UK, where universities can be designated 'teaching only', there is still a requirement that the staff teaching in those institutions keep up with scholarship and research in their field.² While it is difficult to measure the benefits accruing from the co-location of teaching, scholarship and research, it remains a defining feature of the role universities play in a diverse system of higher education provision.

Therefore RMIT strongly believes that access to the title 'university' should not be relaxed by removing a requirement for universities to undertake research simply to make the Australian environment more attractive or profitable for new providers, as has been suggested by some commentators³. More universities will not necessarily result in greater diversity of provision, and there are a number of risks associated with such a step which the paper does not address. These include –

- **Reputation risk** – the higher education export industry is of enormous social and economic value to Australia. Any perceived or real diminution in the quality and standing of Australian universities will have a negative impact on our capacity to engage in international education and research networks and attract international students and staff to Australia.

- **Risk of duplication and narrowing of provision** around areas with immediate high market demand, thereby potentially stifling the emergence of innovation and new disciplinary areas. This is of particular concern in Australia, which has a small population base with limited student mobility and with higher education institutions relying heavily on Government and student fees for funding (note that we lack the philanthropic funding base which in the US supports a diversity of institutions not all focused on high return courses).

- **Financial risk to Government and students** if viability provisions are not maintained. This could be compounded in the context of Free Trade Agreements, under which foreign private providers may access Government funding under conditions no less favourable than those afforded to domestic private providers.

- **Educational risks** to students and other stakeholders if the title 'university' is used to convey too broad a range of activities – there is an increased 'danger' that their expectations will not be met, and that some 'universities' will not recognise the qualifications provided by other 'universities' for the purposes of recognition of prior learning and articulation. This is especially problematic in light of the

² *Building University Diversity*, Appendix C
³ For example, Andrew Norton, 'Universities in a State: The Federal Case against Commonwealth Control of Universities', CIS, 2005.

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need to start harmonising Australian qualifications with other international frameworks.

Based on the above, RMIT believes there is no compelling case for change simply for the purpose of encouraging new universities, and that any decision to change Protocol 1 should be informed by extensive risk analysis. There is, however, as pointed out in the Guthrie Report, a case for clarifying the provisions of Protocol 1 to assist consistent application across jurisdictions and to ensure that they do not operate as an unintended barrier to new universities. The following comments go to specific aspects of Protocol 1.

2.1 Research: Protocol 1 requires universities to be characterised by 'a culture of sustained scholarship, extending from that which informs inquiry and basic teaching and learning to the creation of new knowledge through research, and original creative endeavour.' This is open to interpretation, and its measurability is questionable. This protocol might usefully to be expanded to include a statement on how such a culture might be evaluated, to guide different jurisdictions and to ensure that providers aspiring to the title of university have clear guidelines - in terms of milestones - as to how this might be achieved.

2.2 Field of Study: As noted by Guthrie, the requirement that universities be authorised to award higher education qualifications across a range of fields raises questions about discipline breadth. Some disciplinary breadth is required within a university which, unlike many private providers, is engaged with teaching and research activity across disciplines and at the edge of disciplinary boundaries. In this context Guthrie's recommendation that new universities be required to have at least three fields of study at commencement, with Bachelors, Masters and Doctoral programs in at least one of those fields and plans to develop and/or add to those fields of study offers an opportunity to support the emergence of specialised universities. It should be noted that such a provision may be inconsistent with the current criteria for admission to AVCC membership.

Any distinction around breadth of field is arbitrary to some extent, but it is certainly the case that reputable universities with a limited range of fields of study operate overseas. In a more competitive funding environment, we are likely to see more universities specialising in particular areas of disciplinary strength, so a numerical definition of breadth may be helpful in providing clear signposts to new and existing universities. If such an amendment is supported, reviews of disciplinary breadth should be built into five yearly quality reviews of all universities to ensure no dilution of this requirement.

2.3 Other issues: There are other ways to encourage diversity among universities apart from amending the protocols, and these should be explored. These include providing clear and consistent pathways for providers to enable them to change their standing from non self-accrediting to self-accrediting or from institution to university. Another mechanism is to introduce a bigger range of incentives into Government funding agreements - for example, to facilitate the emergence of dual sector qualifications - and to reward scholarship and research aligned with teaching and community engagement. The outcomes of the Research Quality and Accessibility Framework can support such diversity, by ensuring that different forms of research output are recognised and rewarded.

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3. What nomenclature would be appropriate to designate the different types of institution within the national protocols?

A wide variety of nomenclature is unnecessarily confining for providers, and potentially confusing to students and other stakeholders. From the point of view of regulatory frameworks and quality assurance, the key differences within the Australian higher education system are between self-accrediting higher education providers, non-self accrediting higher education providers and universities. This premise should guide any future decisions about nomenclature.

4. Should the National Protocols provide for different ways of regulating private and for-profit higher education providers and if so on what basis? 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?

In an environment where `public' and `private' universities and higher education providers can all receive access to public funding (even if only in the form of student access to publicly-supported loans schemes), the case for different regulatory regimes for `public' and `private' providers through the National Protocols is diminished.

It does not follow from this argument that all institutions should enjoy the same access to public funds. Government should maintain the right and capacity to regulate to meet different needs - for example, funding mechanisms should acknowledge the community service obligations of existing universities. However, all institutions in receipt of public funds should be subject to consistent accountability requirements. Therefore, RMIT supports consistent quality assurance requirements (in terms of quality, accountability and fairness) for all providers in receipt of public funds, consistent with their mission and designation, in order to

- Minimise risk in relation to the disbursement of public funds
- Provide greater certainty to students and other stakeholder/clients about the education and research services to be delivered
- Protect the `public interest' in higher education provision
- Facilitate pathways and recognition of prior learning between diverse higher education institutions, and their harmonisation with international qualifications frameworks.

RMIT supports the inclusion of information within the protocols which assist institutions wishing to know what steps must be taken in order to change their designation (eg from non self-accrediting to self-accrediting and from self-accrediting to university). This is another mechanism whereby diversity can be actively encouraged.
Attachment 1: Diversity among higher education providers

The following data is drawn from AVCC research, which reflects the following elements of diversity among non-self affreding providers:

- Delivery across all states and mainland territories, broadly commensurate with population spread.

- Spread of delivery across all awards and fields of study, although diversity narrows in relation to research. Research degrees are concentrated in the Arts, Humanities and Social Sciences, and reflect the dominance of theological education and training in this respect (82% of doctoral awards are offered by theological education and training providers).

- Only 12% of providers offer a broad range of awards (from Diploma to Masters/Doctorate). Approximately 28% of providers offer graduate certificate and graduate diploma awards only, 14% offer Bachelor awards only, 13% offer ‘Other’ (e.g. diploma, advanced diploma, associate degree) awards only.

Table 1 - Summary of non-self-accrediting providers offering awards

<table>
<thead>
<tr>
<th>State/Territory</th>
<th>Total Institutions</th>
<th>Total Bachelor</th>
<th>Total Bachelor (honours)</th>
<th>Total Graduate Certificate</th>
<th>Total Graduate Diploma</th>
<th>Total Masters</th>
<th>Total Doctorate</th>
<th>Total Other (Diploma, Advanced Diploma, Associate Degree)</th>
<th>Total Awards</th>
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<tbody>
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<td>ACT</td>
<td>10</td>
<td>5</td>
<td>0</td>
<td>21</td>
<td>42</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>68</td>
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<tr>
<td>NT</td>
<td>5</td>
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<td>0</td>
<td>1</td>
<td>3</td>
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<td>0</td>
<td>0</td>
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<tr>
<td>Tas.</td>
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<td>2</td>
<td>1</td>
<td>6</td>
<td>7</td>
<td>2</td>
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<td>22</td>
<td>4</td>
<td>5</td>
<td>10</td>
<td>5</td>
<td>0</td>
<td>7</td>
<td>32</td>
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<td>SA</td>
<td>26</td>
<td>58</td>
<td>7</td>
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<td>33</td>
<td>26</td>
<td>6</td>
<td>30</td>
<td>80</td>
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<td>15</td>
<td>37</td>
<td>17</td>
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<td>80</td>
<td>44</td>
<td>39</td>
<td>6</td>
<td>49</td>
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<tr>
<td>Vic.</td>
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<td>11</td>
<td>28</td>
<td>64</td>
<td>38</td>
<td>12</td>
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<td>44</td>
<td>189</td>
<td>239</td>
<td>154</td>
<td>28</td>
<td>188</td>
<td>1088</td>
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Table 2 – Awards offered by providers

<table>
<thead>
<tr>
<th>Award</th>
<th>Percentage (%)</th>
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<tbody>
<tr>
<td>Bachelors</td>
<td>25.3</td>
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<tr>
<td>Bachelors (honours)</td>
<td>4.0</td>
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<tr>
<td>Masters</td>
<td>12.3</td>
</tr>
<tr>
<td>Doctorate</td>
<td>2.6</td>
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<tr>
<td>Graduate Diploma</td>
<td>22.0</td>
</tr>
<tr>
<td>Graduate Certificate</td>
<td>16.5</td>
</tr>
<tr>
<td>Other (e.g. Diploma, Advanced Diploma, Associate Degree)</td>
<td>17.3</td>
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Table 3 – Awards offered in each discipline by providers (by level and discipline)

<table>
<thead>
<tr>
<th>Level of Award</th>
<th>Discipline</th>
<th>Business, Administration, Economics</th>
<th>Arts, humanities, Social Sciences</th>
<th>Engineering, IT</th>
<th>Education</th>
<th>Other, Agriculture, Tourism</th>
<th>Law, Legal Studies</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Science, Health</td>
<td>56</td>
<td>104</td>
<td>22</td>
<td>3</td>
<td>0</td>
<td>1</td>
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<tr>
<td>Other (e.g. Dip, Adv Dip)</td>
<td>2</td>
<td>65</td>
<td>122</td>
<td>27</td>
<td>21</td>
<td>5</td>
<td>0</td>
</tr>
<tr>
<td>Bachelors</td>
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<td>0</td>
<td>44</td>
<td>0</td>
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<td>0</td>
<td>0</td>
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<td>1</td>
<td>3</td>
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<td>Graduate Certificate</td>
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<td>84</td>
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<tr>
<td>Masters</td>
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<td>21</td>
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<td>0</td>
<td>3</td>
</tr>
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<td>Doctorate</td>
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<td>85</td>
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<td>12</td>
<td>18</td>
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<td>50.2</td>
<td>7.8</td>
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