



Queensland University of Technology

Response to the Higher Education Standards Panel Consultation Paper *Amending the Higher Education Standards Framework: Provider Category Standards*

14 April 2020

Queensland University of Technology (QUT) welcomes the opportunity to provide comment on the Higher Education Standards Panel Consultation Paper *Amending the Higher Education Standards Framework: Provider Category Standards* (the Consultation Paper).

Question 1: Does the revised description of an 'Institute of Higher Education', transcribed above and in Appendix C, provide sufficient clarity for providers seeking to enter the category?

QUT is satisfied the revised description of an 'Institute of Higher Education' located in Appendix C of the consultation paper provides sufficient clarity for providers seeking to enter the category.

Question 2: Do you foresee any implementation issues in creating the new 'University College' category?

The use of the term 'University College' for this category, as recommended by the Australian Government Response, is not sufficiently clear, distinct or appropriate for its assigned category. The Higher Education Standards Panel should revert to the category name 'National Institute of Higher Education' proposed by Emeritus Professor Peter Coaldrake AO in his final report on the Review of the Higher Education Provider Category Standards.

The word 'University' has a clear, long-standing and widely understood meaning in Australia, and its use as a qualifier in a subordinate category that is not related to existing universities will confuse the understanding of both the 'University' and 'University College' categories, and dilute the special sense associated with the protected term 'University'.

As articulated in our response to the Review (attached), the current Provider Category Standards definitions, characteristics and entitlement to use the title 'University' should be preserved and not expanded; nor should the criteria be diluted to include institutions which do not meet the settled Australian conceptualisation of universities as places for both teaching and research (of a certain quality and a certain quantum). This includes the use of the word 'University' as a qualifier within the name of a transitional or aspirational category, *unless* the institution is operated under the auspices of an existing university.

This proviso accords with the settled meaning of the term 'University College', referring to a tertiary institution operating as a distinct entity but under the purview of an existing university. Historically, such status often served as a precursor towards autonomy and full university status, such as for James Cook University, originally established as a University College of the University of Queensland in 1961, or the University of Wollongong, constituted as a University College of the University of New South Wales, also in 1961. The fact that this title is not currently designated does not render it available for reuse with a substantially different sense than its long-established meaning: and if there are infelicities associated with its use, as asserted in the Australian Government Response, then let those be examined and addressed, rather than exploited as an excuse to repurpose the title. (If this objection is dismissed on the grounds that the historical term is not presently in use, we observe that

the title 'College of Advanced Education', also not in current use, nor subject to the disadvantages of 'University College' that we outline below.)

The chief risk of proceeding with the Government's proposal is that institutions without an association with a university will be encouraged to use that title as part of their designations, creating a false impression in the public domain of the nature of those institutions and their academic governance arrangements, with the very real likelihood that people will make different decisions based on the presence of the word 'University' in the title 'University College' than they might otherwise have done had the title 'National Institutes of Higher Education' been retained.

Another significant risk is that providers acceding to the title 'University College' may assume a sense of inevitability about their ultimate prospects of progressing to the status of a fully-fledged 'University'. Encouraged by those sentiments, and with the reserved meaning of the word 'University' being diluted through the proposed use, it is highly likely that advocacy will ensue towards advancing a degree of 'mission creep' in the prospects of these institutions, not on the basis of their own achievements and quality assurance arrangements but on the basis of the slippage in meaning within the category titling. This would increase the chances of sub-optimal public policy decisions being made on the conferral of the reserved title 'University'.

The key distinction here is that the term 'University College' in its historical and current use does not describe just any higher education institution aspiring to attain the standing of 'University': it very specifically describes such an institution that is an entity within and subordinate to an established university, wherein its practices, academic governance and quality assurance arrangements all conform to those of the parent university. This is a wholly different proposition to allowing the term to be used by a greenfield start-up institution or transitional private provider with little or no knowledge of or obligation to conform to the detailed, well-established practices and standards of an existing university. What is lost when changing the meaning of 'University College' from the former to the latter use are precisely the experience, apparatus, policy and procedures that protect students, employers and the public – precisely those reputation-critical aspects that TEQSA and the Standards regime were established to safeguard.

For these reasons, QUT argues strongly that the proposed use of the title 'University College' is unsound and unsafe. A higher education institution should not feature the word 'University' anywhere in its title except where the institution has an explicit academic governance relationship with an existing university.

Another consideration is the potential confusion that accompanies the word 'College' which is already burdened with a vast array of meanings in use: in Australia, it can mean a hall of residence, a secondary school, a private training provider or a professional society; in the United States it can also signify an undergraduate-only institution, the generic experience of higher education; and (within the term 'Community College') a 2-year associate degree-issuing institution somewhat like our VET sector. This added confusion also militates against the deployment of the word 'College' for this purpose.

The title 'National Institute of Higher Education' recommended by Professor Coaldrake avoids all of these pitfalls, and QUT strongly advises the adoption of that title.

Question 3: Are the requirements in the new 'University College' category sufficiently clear and appropriate to uphold quality and facilitate institutional progression?

The discontents of the title aside, QUT regards the requirements themselves for this new category to be adequate to uphold quality and facilitate institutional progression.

Question 4: Is there sufficient clarity for providers about the distinct requirements in the revised 'Australian University' category for providers offering courses of study in three or more broad fields of education versus those with a 'specialised focus'?

QUT supports the revised requirements of 'Australian Universities' and 'Australian Universities with a specialised focus' and believes there is sufficient clarity for providers in relation to the distinct requirements of both categories.

Question 5: Do you consider the benchmarks above (i.e. that research be 'world standard and/or be of national standing in fields specific to Australia') are appropriate for the revised 'Australian University' category standard?

QUT considers the benchmark that research be 'world standard and/or be of national standing in fields specific to Australia' to be appropriate for the revised 'Australian University' category.

Question 6: What factors should TEQSA consider in determining whether the research at an Australian University is 'world standard', in particular where an existing benchmarking exercise, such as the ERA, is not available?

It is difficult to see how a widely respected assessment of research quality could be sustained in the absence of ERA. We note that the long-term nature of research activity could favour using a reasonably long reference window for these purposes, so that ERA scores do not 'expire' until (say) six years after the last ERA round.

Should ERA for some reason be discontinued, assessment of research quality is likely to default to the unreliable journal rankings, where so-called A and A* ranked journals are considered top in their field. The problems with this method are manifold and serious, which is why the Government withdrew it from ERA (for example, there is very substantial legitimate variation between and even within disciplines; journals focusing on Australian topics are radically disadvantaged relative to generic global journals; and any initial ranking is prone to significant gaming on subsequent iterations). An alternative measure would be success at attracting Category 1-4 grants, where the grants are listed on the Australian Competitive Grants Register (ACGR). This would introduce other elements to the assessment of quality, some potentially welcome, if carefully incorporated (e.g. research impact), and some unhelpful (e.g. structural disadvantage for rural and regional institutions or younger institutions with less well-developed alumni networks and histories of industry collaboration).

The inclusion of Field of Research codes provides a standardised and consistent tool against all measures of research activity (outputs and projects) and reputation (researcher profiles). In the absence of an ERA assessment, any 'world standard measures' would need to translate across the disciplines. This is challenging as all indicators will vary in efficacy across the STEM / HASS boundary, and even within those broad cognate clusters, so discipline-specific measures may be required, or discipline-specific targets applied to the same indicator. Indeed, some indicators may not work at all in one or the other of HASS and STEM.

In light of these challenges and the quantum of new work that would need to be done to arrive at suitable measures, QUT encourages the preservation of ERA for this purpose, easily the most reliable way to conduct a nationally agreed and comparable assessment of research quality.

Failing that, a new method of discipline-specific assessment would need to be developed, so that Australian universities publishing in less well-established or locally-focussed fields of research with a smaller range of high-ranking journals are not adversely judged for similarly quality research. Nationally competitive funding and industry-based funding could also be a measure of high quality and impact, if carefully adapted and appropriately weighted.

Question 7: On what basis should TEQSA assess whether an Australian University meets the benchmark for research of ‘national standing in fields specific to Australia’?

ERA is perfectly functional for this purpose. Fields specific to Australia are still assessed in ERA and are capable of being meaningfully evaluated as at, above or well-above world standard, as the assessment is about the quality, not the content, of the research.

For many STEM disciplines, assessment could benefit from inclusion of indicators of impact and translation, highlighting the value to the end users (whether that be an individual, organisation or a community), translating into policy, clinical trials, education and training programs and patents, with special consideration to research with temporally displaced impact. For HASS disciplines, other indicators may be utilised such as shortlisting for awards, reviews, ticket or book sales, and success in arts grants. In all scholarly fields election to the Australian Learned Academies is a strong indicator of quality at the top end, but more nuanced means will need to be found further down the order.

Question 8: Do the draft criteria for the revised ‘Overseas University in Australia’ category provide sufficient clarity for providers wishing to enter the category?

QUT supports the draft criteria for ‘Overseas University in Australia’, which is near identical to the well calibrated current criteria for an ‘Overseas University’.

Question 9: Are the requirements for industry engagement, civic leadership, and community engagement sufficiently clear in the draft standards?

QUT is satisfied that the requirements for industry engagement, civic leadership, and community engagement are sufficiently clear in the draft standards.

Question 10: Do you have any comment on the draft amendments to the criteria for seeking authority for self-accreditation (Part B2 of the Threshold Standards), described in Appendix D?

QUT does not have any comment on the draft amendments to the criteria for seeking authority for self-accreditation.

Question 11: Do you think there should be provision for greenfield entry to the ‘University College’ category as a destination, as well as a pathway to the ‘Australian University’ category?

No. Greenfield entry into the ‘University College’ category as a destination (cf. as an intermediate step for an existing proven higher education provider) would further confuse the category’s meaning, additional to the several serious problems we address at Question 2.

Question 12: Do you have any comments on the implementation issues associated with greenfield universities?

Greenfield entry into the ‘Australian University’ category would raise questions of academic standards, research quality, policy and regulatory capability and financial sustainability, creating unacceptable levels of domestic and international reputational risk to the entire sector. The very highly regarded Australian university system has by and large avoided the creation of ab initio universities for the last few decades, for good reason, and departure from this established practice should not be entertained without extensive opportunities for further discussion.

QUT welcomes the diversity that new higher education providers bring to the sector, but credible progression towards full 'University' status must be built upon the strong foundation of established capability.

Question 13: Do you identify any issues of concern for providers in the Australian University of Specialisation and Australian University College categories that transition to the new 'Australian University' category—either with or without a 'specialised focus'?

QUT does not raise any issues of concern for providers in these categories transitioning to the category of 'Australian University' under the rigorous standards applied here.

Question 14: Are there other aspects of the transition of providers occupying the Higher Education Provider category to the new categories that the Panel has not considered but should?

Beyond the inappropriateness of non-university institutions bearing the word 'University' anywhere in their category title, QUT does not have any further remarks on transitional arrangements.



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8 March 2019

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Dear Professor Coaldrake

Review of the Higher Education Provider Category Standards - Discussion Paper

Thank you for the opportunity to contribute to the *Review of the Higher Education Provider Category Standards Discussion Paper*. I am pleased to attach a submission outlining QUT's response.

I look forward to discussing this with you further at the consultation on Wednesday 13 March.

Yours sincerely



Professor Margaret Sheil AO
Vice-Chancellor and President



Queensland University of Technology

Response to the Review of the Higher Education Provider Category Standards discussion paper

Introduction

QUT welcomes the opportunity to provide our views on considerations and questions raised in the review discussion paper.¹

The Australian Higher Education Provider Category Standards have served the nation well. They are a pillar of the outstanding quality assurance regime of Australian higher education, which in turn underwrites Australia's spectacular success as an education destination and as a global source of reliable research expertise and capable, work-ready graduates.

The PCS were constructed with care and have been implemented intelligently and with sensitivity to the need to balance regulatory rigour with institutional autonomy and diversity. They are still eminently fit for purpose, and the tolerances built in to the existing framework are adequate to accommodate current and emerging needs. Further, there is no evidence of any significant inadequacy in the PCS, nor of any urgent national need for structural change.

While minor adjustments may be deemed appropriate from time to time to serve genuinely novel emerging needs, tinkering and experimentation must not be indulged, as this will place at risk the reputational and actual capability of the PCS to assure quality across the system.

It is therefore QUT's considered recommendation that the Higher Education Provider Category Standards should not be altered at this time. However consultation should commence on developing more closely defined threshold requirements for teaching activity and for research quantity and quality.

Considerations

Australia's conceptualisation of a 'university'

International comparison

The stunning success in absolute terms of Australia's higher education sector is even more remarkable when viewed in light of our relatively young age and modest national population. Australia has the third strongest higher education system in the world, ranking behind only the United States and the United Kingdom in the QS *Higher Education System Strength Rankings 2018*. This domestic performance – along with our high quality research contribution to global knowledge – drives Australia as a globally competitive destination for international students, now attracting the second largest cohort of foreign students, having overtaken the United Kingdom. Education is Australia's third largest export sector, driven significantly by higher education. The linchpin of this performance is our rigorous national quality assurance regime, of which the PCS is one pillar.

¹ Coaldrake, P. *Review of the Higher Education Provider Category Standards Discussion Paper*. Canberra: Department of Education and Training, December 2018. <https://docs.education.gov.au/node/51731>

While use of the protected title 'university' is more restricted in Australia than in other jurisdictions, that in itself is no argument for loosening the definition: we should define this title to suit ourselves, in the first instance, and with an eye on effects in our international markets, in the second instance.

In the former case, the title 'university' has a settled meaning in Australia: as the discussion paper points out, "Australia has come to conceptualise universities as places for both teaching and research."² The PCS is the technical expression of that conceptualisation. There is no apparent appetite among students, employers or graduates at large to undergo another upheaval of the application of the title along the lines of the significant shifts initiated by the Dawkins reforms of the late 1980s.

In the latter case, there does not seem to be any imperative to ease our focused use of the title 'university' for international marketability. It would appear that Australia's specific application of the title is well understood abroad, and serves as a differentiator from the largely unregulated use of the word in certain other markets. It would not be unreasonable to infer that this factor is a contributor to the perception of quality in the international marketplace that fuels our university sector's success.

Even if our usage is not an active pull factor, opening up the title to teaching-only institutions or to smaller, largely unknown providers would certainly risk undermining a confidence built up over decades in what it means to be an Australian university in terms of scope, depth, quality and reliability. The introduction of such instability would increase the perceived risk coefficient for those considering university study in Australia, to the potential detriment of our entire higher education sector.

Teaching-research nexus and rethinking the research requirement

As the discussion paper notes

To be a 'university' under the PCS, an institution must undertake research that leads to the creation of new knowledge and original creative endeavour, and demonstrate sustained scholarship that informs teaching and learning. The 'Higher Education Provider' category requires providers to be active in research only when engaged in research student supervision and requires academic staff to be active in scholarship that informs their teaching.³

In other words, the PCS requires a university to sustain active scholarship in all areas of coursework teaching and learning, and active research in any area in which research training is taking place.

In effect the latter requirement codifies the widely understood meaning in Australia of a university as a place where higher degree by research (HDR) supervision takes place. The PCS link between active research and the conduct of that research training goes to competence to supervise HDR students.

Arguments about the extent, relevance and even existence of the teaching-research nexus have abounded in Australia and globally for decades, with the Productivity Commission's somewhat instrumentalist contribution⁴ being only the most prominent in recent years. Some arguments both in favour and against are ideological, others empirical, with most a blend of both, and it is unlikely the debate will be resolved any time soon. Fortunately, the utility of that debate for the purpose of the present discussion is negligible.

As the PCS discussion paper notes in the passage cited above, the *Higher Education Standards Framework 2015* does not rely upon a putative teaching-research nexus. The PCS require only active and sustained scholarship – not research – to underwrite coursework teaching: and require research specifically to establish competence to supervise research training. It is hoped that even the Productivity

² PCS Discussion Paper, p.11.

³ PCS Discussion Paper, p.11.

⁴ *Shifting the Dial: 5 Year Productivity Review*. Report no. 84. Canberra: Productivity Commission, August 2017. <https://www.pc.gov.au/inquiries/completed/productivity-review/report>

Commission would endorse the existence and necessity of both a scholarship-teaching nexus and a research-research training nexus. They are all the PCS require.

We therefore come back to the common understanding currently in circulation in Australia of what a university is; to a judgement about whether the PCS captures that understanding; and to the practical question of whether there are any reasons the nation might wish to change that commonly understood meaning by means of a broadening of the PCS.

A distinguishing characteristic of a university in Australia is that it is a place where research takes place alongside learning and teaching; where a dynamic institutional culture fosters both knowledge production and knowledge sharing. This is discovery in its two aspects: the global discovery of research and the individual discovery of student learning. A teaching-research nexus is not a pre-requisite for the existence of such a culture, although there are sound arguments that alignment of these spheres of activity would help it to flourish.

We agree with the PCS discussion paper that the broad understanding in Australia is that a university is a place where teaching is informed by scholarship, where research takes place, and where higher degrees by research are supervised and awarded. This understanding is largely independent of the extent of any teaching-research nexus

The PCS requirements are well aligned with this understanding, by virtue of its connections outlined above, so there is no impetus to change the PCS for that reason.

Signalling differentiation

There is considerable virtue in approaching the effectiveness of the PCS through the lens of the expression of differentiation within Australia's extensive higher education sector. Manifestly, differentiation is signalled most clearly by ensuring that each significant and distinct category has a name that is distinct from and avoids confusion with other categories.

For this reason, we strongly advocate the preservation of the current meaning and application of the title 'university', with the resolution of perceived requirements for differentiation in other categories by means of the use of other titles. In particular, the application of the title 'university' beyond its current meaning by introducing new forms of institutions with that title will only obscure differentiation, rather than signalling it.

The discussion paper considers in various places the desire to create new categories: of particular interest are the proposal to permit teaching-only universities, and to allow research institutes to use the title 'university' (and issue research degrees, a question beyond the purview of the present review). QUT is opposed to both these proposals in respect of their use of the title 'university' but would support the creation of new categories to describe such institutions with greater specificity under different titles should demand to do so be forthcoming.

It is argued the PCS might seek to highlight institutions explicitly oriented towards high quality higher education learning and teaching informed by scholarship, but not engaged in research or issuing research higher degrees. American liberal arts colleges operating on this model rightly enjoy enviable reputations for quality and make a genuine contribution to higher education in that country. In Australia, such an institution would not fit within the broadly held understanding of a university, but that should not prevent the creation of a category – with a different title – if a need for this reform is demonstrated. QUT would have no objection to the creation of a category describing such an institution, with the absolute exception of its use of the title 'university.'

Similarly, but from the other direction as it were, should research institutions be granted the right to issue higher degrees, they should not be entitled to be styled universities if they are not undertaking coursework instruction. This, too, would deviate from the widely held understanding in Australia of what a university *is*. A new category might be countenanced for such an institution, using a descriptive title other than 'university', should the need arise. (Further, and for the sake of completeness, research institutions without students of any kind should not be permitted to use the title 'university'.)

Optimising the PCS

Progression categories

The discussion paper makes a case for the reform of the Australian University College category, pointing to inconsistencies in requirements that make the transition difficult to achieve. QUT would not be opposed to the careful reform of this category into a progression category, probably with the use of stepped tiers within it to signal achievement of milestones. This category should not feature the word 'university' anywhere in its title, except where the institution has an explicit relationship with an existing university willing to guarantee the former's standards.

'Greenfield universities'

Any new entrant to Australian higher education would require a massive investment and a long term view in relation to any potential return to establish from scratch a university of a scale and quality comparable to universities currently in operation. Should a new player appear, however, with a serious long-term interest in contributing to Australian higher education at the university level, it is reasonable that the Australian community requires it to show willingness by establishing its higher education provider credentials and working its way through a progression of steps towards full University status. There are simply too many open questions that would be left unresolved in the case of immediate anointment, including questions of academic standards (across teaching and learning as well as research), policy and regulatory capability and financial sustainability. Haste to bestow the title 'university' on an unknown quantity would create unacceptable levels of reputational risk to the entire sector, both internationally and domestically.

Overseas universities

There is a plethora of reasons an overseas university may not pursue the option to establish an operation in Australia within this category, most of which precede and overwhelm the regulatory considerations. Clearly the current universities within this category have not found the regulatory aspects insuperable.

The discussion paper implicitly asks whether the PCS might be one barrier to 'high quality' and 'reputable' overseas universities setting up in Australia: of far greater interest to the integrity and standing of our sector is the extent to which the PCS constitute a barrier to those of lesser quality or reputation.

The current criteria for overseas universities are well calibrated and should not be changed.

Criteria for self-accreditation

The authority to self-accredit is a great privilege bestowed on behalf of the Australian community through TEQSA, only in the presence of hard-earned trust. It should not be loosened in any way, including in its limited form.

The discussion paper raises difficulties of regulatory supervision of unlimited self-accreditation arising from the prospective nature of many of the criteria specific to this level. These challenges can be addressed by focussing on the integrity of the processes under examination, and making an empirical assessment of the success of these processes in the past to produce outcomes of the required standards. In any case, this implementation challenge should not bring any influence to bear on the PCS themselves, as it would be folly to dilute their rigour or scope simply to make them easier to apply.

Quantity and quality of research

As the discussion paper notes, under the PCS the research requirement is satisfied by activity within as few as three broad areas of research, although that numerical threshold is comfortably exceeded in nearly every instance nationally.

The PCS also does not stipulate any thresholds for activity, either in quality or quantity. (This lack of a defined threshold of activity is reflected also on the coursework side.) It is safe to say that any institution meeting only the bare minimum requirements in any one of these criteria would not be meeting community expectations. Demonstrably, institutions are encouraged by many other means beyond the PCS to teach and research at a high quality across a range of fields. Nevertheless, the PCS should be reformed to reflect the de facto community expectation of minimum quantum and quality of activity in research (and teaching and learning). Detailed technical consultation specifically on this issue should be conducted before changes to the PCS are drafted.

The scholarship criterion is harder to verify directly from the outside, when separated from research, but it is an ongoing responsibility of academic boards in self-accrediting institutions to satisfy itself about the currency of the knowledge of its teaching staff, as a contributing guarantor of quality of instruction. Evidence of the existence and application of processes to confirm the sustenance of scholarship are the means by which TEQSA may satisfy itself on this point. The conduct of academic research necessarily entails the conduct of scholarship within the meaning of the PCS, so demonstration of research in a field satisfies the scholarship requirement by definition.

Discussion questions

The answers below distil the foregoing responses to the considerations raised in the discussion paper, and should be read in tandem with those responses.

1. What characteristics should define a 'higher education provider' and a 'university' in the PCS?

In broad terms, the current PCS definitions and characteristics of 'higher education provider' and 'university' should be maintained. Entitlement to use the title 'university' should not be expanded, nor should the criteria be diluted.

The title 'university' should be more closely defined with improved characterisation around what constitutes qualifying research activity, in terms of breadth of field, quantity of activity and quality of output, as well the threshold quantum of teaching activity at undergraduate and postgraduate levels. The stipulation of three broad fields of research seems to be well accepted and should remain. A broad field should be defined at the two-digit level within the Australian and New Zealand Standard Research Classification. Further sector consultation should be undertaken to determine specific threshold criteria for research quantity and quality, and for teaching activity.

As the discussion paper proposes, there may be benefit to introducing new nomenclature to support further differentiation within the broad, variegated cohort of non-university higher education providers. Implementation will be challenging, however, as creating new categories of protected titles will involve significant negotiation with providers already titled or branded with terms earmarked for restriction under a new paradigm (for example, nouns like college, polytechnic, institute, academy and school are already in wide and varied use, and existing usage is most unlikely to map neatly onto any new taxonomy).

2. Are the PCS fit for purpose in terms of current and emerging needs? Why?

With the above caveat about closer definition of threshold criteria around research and coursework instruction, QUT holds that the PCS are fit for purpose, because no specific evidence of current or emerging needs that the PCS are ill-adapted to address has been adduced.

The discussion paper states:

The higher education sector will need to continue to innovate in order to respond to emerging needs and challenges brought about by globalisation, international mobility, technological advancements, demographic shifts, the changing nature of work, continued massification of higher education, and increasing competition in international education. (p.4)

The higher education sector is well positioned to meet this challenges within its current settings, including with the application of the PCS as currently configured.

There are at present no grounds for overhauling the overall design of the PCS. If there are emerging needs and challenges to the sector, they must first be established clearly and concisely, so that the need for reform can be agreed and the nature of the proposed reform negotiated. Absent the proven existence of actual fundamental impediments, any proposal to alter the PCS is a solution without a problem.

3. Should some categories be eliminated or new categories be introduced? What should be the features of any new categories?

Arguably there could be introduced a category to describe a 'liberal arts college' style institution, with a new title to specify the offering, although it is not clear there is a pressing need for it. There is no harm in leaving un- or modestly-utilised categories intact. There may be some utility for non-university higher education providers in aligning under more specific rubrics, but reservation of protected titles will prove challenging.

4. Do specific categories need to be revised? How?

The 'Australian University College' category could be reshaped as a progression category, and incorporate the probationary stages of any prospective greenfield universities. Some of the requirement inconsistencies alluded to in the discussion paper could be resolved.

5. How would the needs of providers, students, industry, regulator and broader public interest be served by your suggested changes to the PCS?

The PCS regime works very well right now, as a fundamental pillar of our world-leading higher education system. While the discussion paper has addressed a few technical vulnerabilities around the definition of a university, even these are not problematic in practice because other quality-assurance pillars are bearing the load – institutions' defence of their reputations, the high standards of academic boards at self-accrediting institutions, the rigour of academics and the diligence of professional staff. Our recommendation is to fix those technical matters in specific detailed consultation with the sector, and otherwise leave alone a bulwark of our world-class higher education sector, lest we compromise its effectiveness.