

# Review of the Higher Education Provider Category Standards



Victorian TAFE Association Response

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## 1. Introduction

The Victorian TAFE Association is the peak body for Victoria's public providers of Vocational Education and Training (VET), including 12 TAFE Institutes, four Victorian dual sector Universities, and an Associate member, Adult Multicultural Education Service (AMES). Many Victorian TAFE Association members are also higher education providers, including the four dual sector universities and five standalone TAFE institutes.

The Victorian TAFE Association welcomes this opportunity to respond to the *Review of the Higher Education Provider Category Standards*. We would like to draw your attention to a number of issues, including:

- Self-accreditation
- Broadening the view of research
- Amending provider category standards

## 2. Self-accreditation for public TAFE

Section 45(1) of the *Tertiary Education and Quality Standards Agency Act 2011* provides universities with the power to self-accredit courses of study. The extension and sanctioning of this important power through primary legislation (as opposed to subordinate instruments) is evidence of Parliament's acceptance of a diversity of higher education providers, some of which (universities) can be entrusted with this significant authority.

The provenance of this trust can be traced to universities' lower risk profile compared to other higher education providers, which is likely attributable to their (on the whole) public ownership. By virtue of their public ownership, universities face considerable regulatory oversight and reporting requirements (including the requirement that universities report directly to the parliaments that have ownership over their establishment acts). This oversight instils Parliament and the broader community with a large level of knowledge regarding the activities of the universities, making the extension of a significant power such as self-accreditation a comfortable task.

In many ways, TAFE institutes that are registered to provide higher education programs are equivalent to universities. They are publicly owned higher education and training providers, many of which have pedigrees that can be traced back over 150 years. Like universities, TAFE institutes are established by legislation and face rigorous reporting requirements and oversight. For example, TAFE institutes in Victoria are subject to the:

- establishment provisions of the *Education and Training Reform Act (ETRA) 2006* (Vic) and establishment acts in the case of the four dual-sector universities.<sup>1</sup>
- subordinate instruments of the ETRA (such as the Strategic Planning and Commercial Guidelines, and the reserve powers conferred to the Minister under section 3.1.19).
- *Public Administration Act 2004* (Vic).
- *Financial Management Act 1994* (Vic).
- *Audit Act 1994* (Vic) and the oversight of the Victorian Auditor General.
- Victorian Minister's Statement of Expectations of TAFE institutes.

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<sup>1</sup> These Victorian acts include the *Victoria University Act 2010*, the *Federation University Act 2010*, the *Royal Melbourne Institute of Technology Act 2010* and the *Swinburne University of Technology Act 2010*.

- regulatory oversight of the Victorian Department of Education and Training, including through regular Strategic Dialogue meetings to monitor TAFE institute performance.

The oversight levied on TAFE institutes is clearly of a magnitude similar to that imposed on the universities. This, coupled with their public ownership, makes them comparable institutions that should, *ipso facto*, be subject to similar regulatory requirements. But current regulations mean that a TAFE institute is, for all intents and purposes, treated in the same manner as other higher education providers, with public ownership conferring no benefits or ‘risk discount’.

The Victorian TAFE Association therefore recommends that TAFE institutes are registered as higher education providers and have successfully secured accreditation (ie: no conditions) for their courses on two consecutive occasions enjoy an automatic right to self-accreditation. Like the universities, TAFE institutes would only enjoy this right subject to demonstrating attainment of threshold standards during a re-registration process. This recommendation recognises the large levels of scrutiny wielded on these public providers (TAFE), the swathes of information and management that results from this, and the need for a regulatory framework to countenance this in its design.

The 2016 Review of Higher Education noted the length of time it takes to have courses accredited, the “implications for responding to market forces and the significant advantage this gives self-accrediting institutions”.<sup>2</sup> Extending the right to self-accreditation to TAFE institutes would provide greater flexibility to meet industry demand for skills and provide a faster and more flexible platform for the creation of courses that meet industry need, particularly for new and emerging skill areas.

The same review also noted that risk should be a determining factor with respect to regulatory design and treatment, including to how “the principles of risk, necessity and proportionality apply to different types of providers”, including for “publicly funded...for profit providers and/or not-for-profit” institutions.<sup>3</sup> Moving from this, regulations that treat TAFE in the same manner as other higher-risk higher education providers levies a level of regulatory burden that is unnecessary and whose costs can be said to be higher than any perceived benefits. The Victorian TAFE Association’s recommendation would therefore serve to give life to the 2016 recommendation. The proposal would provide the added benefit of freeing regulator resources consumed by self-accreditation processes on TAFE and allow them to be devoted to areas of greatest risk.

### 3. A broadened view of research

A major theme permeating the Provider Category Standards is research, so whichever notion of research is followed poses implications for the development of the Provider Category Standards.

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<sup>2</sup> Dow, Kwon Lee and Baithwaite , Valerie (2016), *Review of Higher Education Regulation Report*: 10 (see <https://docs.education.gov.au/system/files/doc/other/finalreviewreport.pdf>, accessed 26 February 2019).

<sup>3</sup> Dow, Kwon Lee and Baithwaite , Valerie (2016), *Review of Higher Education Regulation Report*: 57 (see <https://docs.education.gov.au/system/files/doc/other/finalreviewreport.pdf>, accessed 26 February 2019)

The Frascati manual describes research as “creative and systematic work undertaken in order to increase the stock of knowledge...and to devise new applications of available knowledge”. It goes on to identify three main types, including basic (or fundamental) research, applied research and experimental development.

Another way to look at research is to view it as operating along a spectrum, ‘bounded’ by fundamental research at one end, and applied and translational research at the other. Drawing on the Frascati approach, fundamental research can be described as “experimental or theoretical work undertaken primarily to acquire new knowledge of the underlying foundation of phenomena and observable facts, without any particular application or use in view”. On the other hand, applied research is construed as investigation directed towards acquiring new knowledge for a specific purpose or practical aim and with a specific use in mind. Translational research too is motivated to create and demonstrate practical use but goes further towards adoption and/or change in institutional and/or social structures and in human practice and custom.

It would be fair to say that the idea of research that dominates the development and implementation of the Provider Category Standards is fundamental research. But this fails to grasp the breadth and diversity of activity that would be included by the Frascati definition, much which occurs outside of university confines.

A prominent feature of TAFE (and indeed the wider VET sector) is its links with industry and community. Perhaps the most well-known way this manifests itself is in training courses that have a direct industry and community link, and whose creation and sustenance hinges heavily on relationships that provide access to the expertise of industry, community and other end-users. Increasingly, however, the sector’s links with industry and community have evolved, finding expression in an increasing number of areas. One of these is in research.

Given the TAFE sector’s reputation for providing solutions to real-world problems, it is unsurprising to find that TAFE research activity is mostly applied and translational. There are a number of ways that TAFE research activity is manifesting, such as:

- Investment by the Victorian TAFE Association members to support and build research activity, such as:
  - The allocation of more than \$600,000 over three years by William Angliss Institute to support staff to undertake research projects and to develop HERDC recognised research outputs. William Angliss institute has also linked scholarly practice to currency requirements for all teaching staff, with research not optional but a fundamental part of teacher duties<sup>4</sup>.
  - The establishment of the Centre for Applied Research and Innovation at Holmesglen Institute, which works (among other things) to assist in the identification of applied research and innovation opportunities and to foster student involvement in applied research and innovation.
- Leading and partnering in large scale research projects by TAFE institutes. By way of example, Holmesglen Institute is working with universities and its partner, Healthscope, on a National Health and Medical Research Council (NHMRC) funded project to prevent falls in Australian hospitals; and with South East Water to develop heating processes for harvested water for use in domestic dwellings (which involved construction of test facilities at Holmesglen). Another example is at Sunraysia Institute of TAFE (SuniTAFE) and its industry partner, Agromillora (a world leader in

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<sup>4</sup> See Angliss at [https://www.aveetra.org.au/data/1.0-AVETRA\\_Newsletter\\_Dec.\\_2018.pdf](https://www.aveetra.org.au/data/1.0-AVETRA_Newsletter_Dec._2018.pdf) p12, accessed 4 March 2019

fruit and olive tree propagation) are working on experimental super high-density crops of almonds and olives at SuniTAFE's Cardross Farm.<sup>5</sup>

- The development and operation of world-class infrastructure used for TAFE teaching and research activities, such as the Automotive Centre of Excellence located at Bendigo Kangan Institute (which includes world-class vehicle and engine testing facilities and a purpose built auto-electrical lab); facilities developed by Chisholm Institute, including the Health Centre of Excellence at its Berwick campus (which features nurse training and simulation laboratories) and the Centre for Advanced Manufacturing at its Frankston Campus (which includes a purpose-built, industry-driven flexible, integrated Design Centre); cutting edge facilities at William Angliss Institute (such as 3D printers); and the establishment of Australia's first Clinical School for enrolled nurses developed by Holmesglen Institute in partnership with Healthscope.
- Research Fellowships offered by the International Specialised Skills Institute, which supports researchers in the TAFE and VET sector to undertake international research with the intention of generating actionable knowledge, solutions and innovative practice to inform education and training practice and industry processes<sup>6</sup>.
- Establishing applied research dissemination platforms, including events and symposia hosted by the Victorian TAFE Association and others<sup>7</sup> and the development of Applied Research and Innovation Webinars to give TAFE researchers an opportunity to display research to their peers.<sup>8</sup>
- The establishment of the VET Practitioners Research Network, which provides an outlet for the dissemination and sharing of research activity that occurs within the VET sector.<sup>9</sup>

While we can identify widespread examples of (what Boyer<sup>10</sup> would describe as) 'scholarly' activity or (Frascati would codify as) research, the Australian VET sector is more likely to describe these as 'industry partnerships' or 'reflective practice'. This is starting to change; for example, in 2018 the Victorian TAFE teacher industrial agreement<sup>11</sup> includes references to applied research and Boyer, for the first time.

In the university sector, it is common to encounter differentiation based on the level of research maturity. At one end of the spectrum are research-intensive universities that are 'highly evolved' in research, while at the other are research-focused and research-fledgling universities (which are universities that have research profiles that are not as mature or

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<sup>5</sup> Further examples of research projects can be seen at <https://www.vta.vic.edu.au/applied-research>, accessed 26 February, 2019.

<sup>6</sup> International Specialised Skills Institute fellowships at <http://www.issinstitute.org.au/fellowships/> accessed 3 March 2019

<sup>7</sup> For example, a Symposium was held in 2016 that was attended by approximately 160 people. The purpose was to showcase applied research in TAFE (<https://www.vta.vic.edu.au/research-directory/applied-research-events> accessed 26 February 2019). In 2018, a conference was organised by the Australian Vocational Education and Training Research Association to showcase VET practitioner research (<https://www.avetra.org.au/pages/inaugural-avetra-vet-practitioner-research-conference-2018.html>, accessed 26 February 2019).

<sup>8</sup> The Applied Research and Innovation Webinars can be seen here: <https://www.vta.vic.edu.au/research-directory/webinar-series> (accessed 26 February 2019)

<sup>9</sup> <https://vprn.edu.au/>

<sup>10</sup> Boyer, E. 1990 Scholarship Reconsidered, available <https://depts.washington.edu/gs630/Spring/Boyer.pdf> accessed 4 March 2019.

<sup>11</sup> The Victorian TAFE Teaching Staff Agreement 2018 (<https://www.vta.vic.edu.au/employment-relations/victorian-tafe-teaching-staff-agreement-2018>) accessed 3 March 2019

developed). This spectrum of activity was a motivating factor behind the development of the Commonwealth Collaborative Research Networks program, which sought to expose less developed research universities to the ways of their research-intensive cousins.

The Victorian TAFE Association therefore recommends that future iterations of the Provider Category Standards adopt a view of research that accommodates its diverse forms. We consider that the principle underpinning the research spectrum referred to above points to a way forward. By adopting this principle, the Provider Category Standards would therefore recognise different forms of research activity, as well as different levels or grades of research maturity required to meet a given standard. However, we consider that this spectrum not be seen as journey, so that a higher education provider be required to move along the spectrum with the aim to achieve research intensive status. Instead, a provider should be able to rest at a point on the research spectrum that suits their particular profile and strategic aspirations.

#### **4. Amending provider categories**

The discussion paper to this review notes that registration of higher education providers occurs overwhelmingly in two categories: the general 'Higher Education Provider' category, and 'Australian University'. The implication drawn from this is that the four remaining categories have little "utility", leading the authors of the paper to posit whether "they should remain".

An alternative interpretation could still be rooted in the utility or otherwise of a given category, but might instead determine that the policy response should be not to 'expunge' a given category but instead to amend to make the category more 'useful'.

A case in point is the current Australian University College category. The current standards render this a progression category that is available to a higher education provider that "has realistic and achievable plans to meet all the criteria for an "Australian University" Category within five years".<sup>12</sup> Further, this Category includes requirements for research activity that aligns with a traditional and fundamental view of research.

The Victorian TAFE Association considers that subscription to this category could be increased by removing its transitory nature. Further, drawing from the discussion in Section 3, the adoption of the recommendation that the conception research should be 'graded' to recognise different types and levels of research maturity would enable greater opportunity in meeting research requirements.

The current approach leads to the mostly binary sector referred to by the review, made up of "Higher Education Providers" and "Australian Universities". This approach does not enable easy comparison or differentiation, nor does it facilitate institutional development. It also does not enable identification or appreciation of the large levels of research activity undertaken by TAFE institutes. But amending the current requirements of the Provider Category Standards by removing transitory elements and adopting a more graded view of research would enable bodies such as TAFE institutes that are registered Higher Education Providers to 'progress' along a provider spectrum.

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<sup>12</sup> *Higher Education Standards Framework (Threshold Standards) 2015*, Part B, Section B1.3



## 5. Key contact

The Victorian TAFE Association welcomes the opportunity to speak further to the issues outlined in this submission. To do so, please contact:

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