OPINION PIECE – 26 September 2011

“Flawed logic penalises TAFE institutes”

Not surprisingly, the Knight Review into the Student Visa Program has received a glowing endorsement from the universities. The decision by the Federal government to accept the recommendation that universities should be treated differently from all other providers, including those offering higher education degrees, clearly gives the universities a significant advantage in recruiting international students.

The basis for such a decision comes down to the nine factors cited by Knight as differentiating universities from other providers. I would argue the 58 locally based TAFE institutes in Australia and owned by their respective State and Territory governments, more than meet the criteria used by Knight.

While accepting universities are often the first choice for prospective international students and are held in high regard, they are not the only providers regarded as offering the highest quality of education and nor are they the only ‘spearhead’ for our international reputation. The Chinese government specifically singles out TAFE institutes as approved study destinations for their students and Chinese tertiary vocational institutions have numerous articulation and joint certification agreements with our institutes. Knight ignores the high reputation TAFE has internationally for the quality of its provision, including degree level programs which are all subject to external review, accreditation and audit.

This high level of quality is consistent across all TAFE institutes in Australia, and just like the universities, TAFE institutes are highly competitive within their own jurisdictions as well as nationally and internationally. While we are yet to see a ranking regime applied to the VET sector, I would strongly argue the quality of TAFE provision is universally high.

Knight seems to argue that because universities have their own act of parliament and have the power to self accredit their own courses, this affirms their special status. Perhaps the subtext here is this status means they are to be more trusted.

TAFE institutes are constituted as government owned enterprises, with state and territory governments using a variety of legislative instruments to affirm their status. In NSW, TAFE Institutes are governed by the TAFE Commission Board, a statutory advisory body established under the Technical and Further Education Commission Act 1990. South Australia is currently in the process of establishing their three institutes as statutory authorities and Queensland already has two institutes under similar legislative arrangements. There are also currently four TAFE registered training organisations under the governance of universities.

In many ways, our TAFE institutes are more highly regulated at both a state and federal level than any other provider. This includes the requirement to provide comprehensive data on all activities through the AVETMISS system, something yet to be enforced for all VET providers. State and territory treasury departments maintain a strong grip on financial operations and reporting, and as government entities TAFE institutes are subject to all other legislative requirements laid down by their state or territory governments.

Simply put, Knight is suggesting universities are to be more highly trusted than state or territory government agencies. Perhaps it’s time the owners of TAFE took a stronger stand in protecting their interests.
On the question of self accrediting status, I would argue the processes required of TAFE institutes to accredit higher education qualifications are more rigorous, and certainly subject to a more extensive external review and approval process than required of universities. How the ability to self accredit courses somehow warrants special status for student visa applications is not made clear.

There is no doubt gaining the title ‘university’ is much more difficult in Australia than in many other countries. Certainly the value of such a title has just been increased with the Federal government’s acceptance of the Knight recommendations.

By using the fact that it’s difficult to gain university status in Australia, Knight suggests this is a good enough reason to treat them differently when it comes to the student visa program. Can I suggest it’s equally difficult gaining TAFE status if not impossible, as state and territory governments show no appetite for increasing the number. In fact we are more likely to see a reduction in stand-alone TAFE institutes through mergers and dual sector arrangements.

Knight’s reasoning also flies in the face of Federal government policy which sees the emergence of an integrated tertiary sector with a single regulatory body. Knight’s ‘old school’ approach reinforces outdated stereotypes and elitist views of post secondary education.

Knight’s reasoning is that by giving universities special treatment, if things ‘go off the rails’ it will be easier for DIAC to rein them in because there are only 39 of them. This is not exactly a ringing endorsement of high quality, low risk and as Knight himself admits, ‘the universities are not perfect’. While he affirms his high regard for the quality and integrity of the 39 universities, he fails to consider the low risk attributes of a similarly small number of state/territory owned TAFE institutes.

This comparative low risk is further emphasised when you consider on average, one in four students at a Group of Eight university are international students, with an average of one international student for every five domestic students in all Australian universities. This ratio is one of the highest in the world. For the whole public VET sector, including all qualification levels, the ratio is less than one in 27.

In terms of stability, TAFE institutes are equally well managed with high levels of accountability and transparency. The Knight Review perpetuates the flawed impression the problem lies within the VET sector, as though this sector can be treated as one amorphous whole. Recognition should also have been give to the fact not one TAFE institute has collapsed or has come close to collapsing.

In terms of the financial stake the Australian taxpayers have in Australian universities, I would contend there is at least an equivalent stake in the publicly owned TAFE institutes. Like the universities, the mission of TAFE institutes is to create quality public education rather than generate a private profit. There is strong justification, based on public policy reasons and the potential burden on Australian taxpayers for further shortfalls in funds through the reduction in international student numbers, to protect government investments in TAFE. In fact TAFE is more exposed to such a shortfall, with current falling enrolments far exceeding those of the universities.

The one factor in which TAFE may not achieve equivalence with Knight’s justification for special treatment of universities is in the area of length of tuition. Knight argues that because international students spend longer at university, their value is greater. This takes a fairly simplistic view of what is often a far more complex set of study patterns. Many international students embark on a course of study which includes English language tuition, followed by a vocational qualification which then
articulates to a university or higher education degree. Such pathways appear to be ignored by Knight, or at the very least wholly attributed to the university sector.

Knight’s final justification is based on relative risk and he uses the rate of approved study visa grants as the sole basis for treating universities differently. As far as I am aware the visa grant rates published by the Department of Immigration and Citizenship (DIAC) refer to the higher education sector, not specifically universities, so unless Mr Knight has been privy to some additional data, this reasoning cannot be justified.

For several years, the TAFE sector has been requesting an analysis of student visa data from DIAC which clearly differentiates between provider categories, not sectors. The response to date has been less than enthusiastic, with inadequate data systems and lack of funding being given as the reasons for not providing this level of analysis. Hopefully, a provider based risk management approach to the student visa program will resolve this impasse.

There is much to commend the Knight Report and the Federal government’s acceptance of all 41 recommendations. What is lacking is recognition from a Federal level that there is a clear public policy justification, indeed a taxpayer imperative, to treat TAFE institutes in a different way.

PETER HOLDEN
Director International Engagement
TAFE Directors Australia

Peter.holden@tda.edu.au
0405 081 780