



National Higher Education Protocols Consultation Draft

Submission by TAFE Directors Australia

Canberra

May 2006

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TDA Submission – May 2005

1. About TAFE Directors Australia

TAFE Directors Australia Inc. (TDA) is the peak body representing Australia's TAFE colleges and institutes across territories and states. 'TDA' additionally represents associate members, and together provides provider representation for TAFE institutions domestically, and provides collaboration with regional and international providers and industry to achieve improved educational linkages and commercial engagements.

As the primary and pre-eminent provider of quality vocational education and training in Australia, TAFE has a critical and central role to play, together with industry, in meeting Australia's future skill needs.

TDA welcomes the opportunity to comment on the scope of, and current arrangements for, the National Protocols for Higher Education Approval Processes considering that this presents options to reconsider the future arrangements for Australian tertiary education.

Workplace learning is among the highest priorities for Australia's economy. TAFE is a pre-eminent provider of training and education, and TAFE Directors Australia through its Member Network seeks to mentor the changes for VTE training to successfully meet the changing needs of Australian industry, especially with national priorities for mature career development.

A large factor supporting high enrolments across TAFE has its strong sector nexus between training and industry, especially SMEs. The \$5B Backing Australia's Ability initiative from 1997-98, and BB Mk II (\$7B) demonstrated the increasing need for Australia to nurture innovative strategies across the education, training and research sectors. Just as the development in research supported the prospects of Cooperative Research Centres (CRCs) and similar strategies, so TAFE has welcomed international developments to allow traditional technical colleges to more effectively service its traditional industry client base – with upskilling continually in demand.

TDA notes VTE developments in countries where innovation has been foremost, EG Scandinavia. In Scandinavia, applied university degrees have been offered by a greater range of institutions as part of a national reform process to ensure greater relevancy throughout lifelong learning and greater access to higher education for all. By expanding the higher education marketplace not only are there more options provided for students, but also traditional universities will be encouraged to be more strategic and cost-effective in their offerings and place greater premium on industry relevance.

TDA expands on such exemplars in this submission. Our focus is to showcase the desire of TAFE in Australia to improve its client service, and opportunity to more effectively take mentor innovation in our educational and training qualifications.

2. Background

2.1 One model fits all ..?

TAFE Directors Australia refers to its previous submission just one year ago, in May 2005. In that submission TDA presented a case that the current tertiary education approval processes were unsustainable, and proposed the system should be overhauled as it did not provide equitable access to 'tertiary' education for all Australians.

TDA is surprised that the consultation draft only goes part way to achieving that end. We argue this raises concern that at a domestic level the existing model exposes Australia to ongoing skill needs in an emerging knowledge economy and society. Internationally, TDA argues it is important that the Australian, state and territory governments take note of the benefits for more structural alignment with innovative VTE educational systems abroad. In particular, TDA advocates Australia looks to dynamic reforms to higher education and vocational training and education abroad, and how structural change has facilitated significant improvements in engagement with youth in skilled training, skilled trade completion rates, and application of skilling to an older workforce and population seeking seamless pathways in career development and change.

One year later after our initial submission, the central case proposed by the TAFE sector is even more pronounced: justification for diversification is based on labour market dynamics, and economic change in Australia.

Specifically TDA seeks a more thorough review of educational structures, and refers to innovative economies such as Finland and Sweden. In both cases, these nations created more 'fusion' and diversification, taking account of student – young and adult learners – who have desired more innovative pathways into employment, and to step further into job opportunities. This provided for revision of structural traditions and 'walls' between systems, and allowed wider pathways between vocational education and higher education. This enabled movement in economic positions: from positions of high unemployment to low unemployment, increased employment roles leveraging aging population cohorts, and economies dealing effectively with high skill needs and trades shortages. As Australia faces critical shortages, TDA notes that as a nation in the early years of the 21st Century we remain an education sector highly structured with rigid pathways and institutional cross-overs offering their clients limited ranges of qualifications, credit transfer systems, and interface with industry. A further note to our Submission comes from TDA and its Members which have struggled with the somewhat 'grey' definitions to the meaning of aspects in the Higher Education Protocols themselves, and we wish to separately address this as an issue in our TDA 2006 Submission.

As our paper proposed in 2005, the essential question remains in 2006: "What sort of tertiary education system does Australia want to meet the future needs of individuals, industry and society?"

For TDA's members not pursuing vigorously reform to education provider protocols inhibits institutes abilities to provide lifelong learning at increasing levels of technical sophistication required to meet the higher skill needs of industry. Allowing a wider selection of institutions to offer degree programs also places competitive pressure on universities to offer more industry relevance at a more economical cost.

To respond well to increasing demand for post-secondary education and expand access and provide better opportunities for life long learning for all requires a restructured model of higher education in Australia that would:

- encourage diversity within the system rather than limiting it as occurs under the current Protocols;
- improve access for a range of disadvantaged Australians not well catered for under the present system;
- better meet the needs of individuals by creating improved pathways that will permit lifelong learning;
- remove the nexus between research and teaching; and
- create a higher education system that will achieve workforce needs, including those of existing workers.

The consultation paper as did your original discussion paper fails to give sufficient recognition to dual sector provision in vocational education and training and university education - now a most successful and permanent feature of the Australian environment. Universities, particularly regional universities, now offer a large number of certificate level courses, as well as diplomas, advanced diplomas and vocational degrees in what have through long practice been traditional VET areas.

The current Protocols are based on a model of two distinct types of tertiary education institutions – universities and non self-accrediting institutions. TDA remains opposed to this approach based on arguments previously presented on the size and maturity of the sector and its historical emphasis on access for all.

2.2 Definitions & Clarity

TDA wishes to indicate the need for greater clarity in the proposed National Protocols. In many respects the terminology used for non self—accrediting higher institutions may be open to interpretation, and for this reason – and transparency across sectors – some work on definitions would be recommended.

In addition, the governance arrangements for non self-accrediting institutions should be transparent. EG It is important the Protocols provide clear governance arrangements for review and approvals to be beyond the judgement of merely representatives of existing higher education officials.

Protocol A may be open to interpretations, EG criterion A6 combining scholarship with research, and whether such TAFE specialist industry skilling and technological areas of development would qualify? Protocols B & C especially provide examples of Protocol terminology open to interpretation. Protocol D may arguably remain open to

question, EG for arguably closing options for criteria to TAFE providers for University College or specialist institutional status.

For this reason TDA argues that an Education Working Group be appointed to provide MYCEETYA with clarity on the Protocols criteria proposed.

3. Higher Education Accreditation arrangements

3.1 Rigidity

We are disappointed that the consultation paper still uses the term *higher education*, which we argued fails to capture the diversity of institutions and future needs of learners as they increasingly make transitions from secondary education, through multiple pathways to a range of tertiary education options.

A preferred option is the use of *tertiary education* – designed to encompass all post-secondary forms of education and training. The AQF definition of *higher education* is, “post-secondary education offered by a university or other recognised higher education institution, or through Open Learning Australia, leading to the award of a degree or higher level qualification.” This definition could be easily altered to *tertiary education*, allowing a more workable resolution of the problem of the blurring of boundaries between public and private institutions which is not dealt with satisfactorily under the current definitions.

TAFE Directors Australia points to the Ai Group ‘*World Class Skills for World Class Industries*’ Report (May, 2006), covering detailed survey interviews with 500 Australian companies. It concluded:

“Employers’ demands for higher skill levels, driven by increasing competitive pressures, changes in market demand and technological change... mean that the higher education sector is becoming an increasingly important training provider for industry. Together with changes in institutional arrangements, this trend is also blurring the boundaries between the vocational education and higher education sectors. Students move across sectors, both TAFE and universities are starting to offer the types of courses traditionally offered by the other, and there are examples of innovative courses being developed through collaboration between institutions in the two sectors.” (p35)

The Ai Group Employer Survey proceeded to detail examples of this trend, including the growing numbers of undergraduate students enrolling with TAFE diplomas, and conversely TAFE enrolments from students with undergraduate degrees. TDA notes from its Members extensive collaboration with this finding, EG - In TAFE SA, Regency Institute of TAFE collaborates with local universities and industry for 4-5 year food science joint diploma and degree joint qualifications. At Swinburne University of Technology (VIC), a dual sector institution, trends of “some 27% of those enrolling for undergraduate degrees in 2005 were TAFE graduates, with the trend increasing.” RMIT Victoria also reports high demand for dual-qualifications.

3.2 Accrediting Institutions

TAFE Directors Australia notes its disappointment that in the accrediting institutions the paper continues to revert to the term *university sector* when referring to those people seconded to reference committees. This approach allows current universities

through pre-eminent scholars drawn only from the *university sector* to apply criteria which are not necessarily appropriate for some institutions. This bias is unlikely to be conducive to creating diversity in the tertiary education sector.

TAFE institutions ensure quality in part by including industry stakeholder representatives within their decision and in particular curriculum processes. Therefore we strongly recommend that the membership of reference committees be broadened to include representation of industry and professional bodies.

3.3 Self-accrediting and non- self-accrediting institutions

In 2005 the TDA submission argued that some TAFE institutes that satisfy the relevant conditions expected of a *university* should not be prevented from applying for university status purely on the basis that they are a TAFE provider. And that mechanisms allowing TAFE Institutes to deliver higher level qualifications should be put in place should they meet the requirements to do so. This status should only be granted after having satisfied a rigorous, independent examination of the institution applying including their:

- systems;
- resources;
- financial viability and stability;
- size, scope and scale of offerings; and
- quality of teaching (measured in terms of staff-student ratios and qualifications of teaching staff).

We also argued that an institution's ability to meet these criteria would ensure appropriate quality and an approach modelled on the Australian Quality Training Framework (AQTF) would provide a useful starting point, with a single tertiary education quality body (such as a modified version of AUQA) covering the broadened sector.

These suggestions have not been taken up in the consultation paper and we are particularly disturbed that the protocols appear to encourage the creation of institutions very similar to existing traditional or *sandstone* universities.

We are, however, pleased to see that the paper supports a single national accrediting body, and encourage DEST to broaden the terms of accreditation to allow greater diversity without reducing quality requirements.

3.4 The link between teaching and research

In our submission we argued that research should not be the sole criterion by which access is granted to the use of the term *university*. We were, therefore disappointed not to see provision for teaching-only universities.

The allowance of "scholarship" (provided it is adequately defined) for awarding a modified university title is a positive step but should also be provided for universities.

3.5 Three tiered approach

Notwithstanding the above TDA remains adamantly opposed to the three tiers of institutions proposed in the paper. We reiterate that this model entrenches the status quo and does not offer development options for TAFE institutes or private providers

to move within the proposed range of tertiary education providers. This approach also has the potential to limit the pathways in applied learning from Diploma/Associate degree to Bachelor degrees within VET institutions themselves.

At the very least the paper should provide for mechanisms that institutions can fairly be assessed as they grow into the categories indicated viz TAFE institution becoming a Higher Education provider, a higher education provider seeking modified university title, and developing into a university (based on teaching and scholarship not one view of pure research). This includes a pathway towards university status which is not biased but the current view of what a university and reviewed by reference committees which are not dominated by representatives of existing universities.

3.6 Diversification

We argued that in Australia there is a growing demand in TAFE for higher level courses with an applied focus including degrees, graduate certificates and graduate diplomas in specialist or niche areas where TAFE is seen by industry as having the required industry expertise, credibility and track record.

This diversity will continue to grow as more government-funded TAFE providers seek to deliver a greater range of what have been traditionally viewed as tertiary qualifications. We therefore see the Protocols as needing to embrace diversity to facilitate, not hinder the natural growth of the tertiary system. The Protocols as they stand still militate against this seamlessness.

3.7 International Models

Several countries have moved more quickly than Australia to align innovation and micro-economic reform strategies with structures in education & VTE. TDA argues that this is paramount if Australia is to take advantage of the economic reforms of the past 15 years, and competitive advantage achieved with recognition that ours is a 'knowledge-based' economy. It is vital we take advantage of Australia moving to the 'Top 5' in rankings of countries for international post-school education enrolments, and create international recognition alignments beyond 'traditional' higher education. This is especially relevant at two levels:

Australia regularly benchmarked for its education standards and rankings for international students – now ranked in the Top 5 league as international educators -- USA, UK, Germany and France, and Australia. This growth exposes Australia's part of this education growth with regard to VTE. The VTE segment of education has become the most strongly growing component of international education, yet countries like Finland and others in the EU have demonstrated they are highly focussed on the VTE sector to lead industry / educational cross border linkages for accreditation and system reform, especially reliant on the Copenhagen model, and create more innovative outcomes economically. While this has EU relevance, it is not outside our capability to show leadership and grow TAFE beyond Australia, and inbound to Australia.

COAG – The inclusion of mutual recognition as part of the reference on skilling is an issue which provides an ideal opportunity for Australia this year. With national, state and territory governments committed to reform across VTE in 2006, TAFE argues that international models would benefit the protocol review, with focus to align innovation with reform to higher education structures.

FINLAND

In Finland after its educational reforms, the Department of Education records that 96% of students continue with studies after secondary education. Polytechnics offer bachelor and masters degrees, with close industry linkages.

The Finland model relies heavily on a 'tripartite' cooperative model with providers given high levels of autonomy, working with student clients and employers / industry. The strategic focus of Finnish education strategies for VTE has been a developmental plan over 10 years. It sought to provide wider pathways to higher education, and with its 'fusion' of educational options, also allowed for assumptions that more developmental approaches can benefit those leaving school who might otherwise engage in industry or more structured education. This placed higher regard on VTE and skilling for careers post-secondary, raised those engaged in study post-secondary, and increased completions in VTE.

In Finland important goals were to promote regional development and meet regional needs for higher education. Regional networks of local government and industry cooperate to improve the nexus between education and working life.

SWEDEN

In Sweden reform of Advanced Vocational Education has had a strong emphasis on learning at work with at least one third of each programme dedicated to workplace-based learning.

Swedish programmes must demonstrate the modification of local workplaces for learning, a detailed plan how individual students can enhance analytical capabilities, apply a holistic approach to their profession, learn to take responsibility for their work and cooperate in teams in short to lay the foundations for continuing training throughout their working life. Each program has a local committee involving employer and representatives and trade unions.

Models of work-paced based learning were expanded beyond traditional apprenticeship models to include, for example, innovative approaches project-based learning which allow students to plan and coordinate their work in cooperation with other students and company sponsors.

EUROPEAN UNION

In October 2004 The Council of the European Union agreed a communiqué on future directions in vocational education and training which in part read:

“VET is increasingly taking place at all educational levels and, therefore, the complementarity and links between VET and general education, in particular with higher education, need to be particularly addressed.”

The communiqué also invited member states:

“To develop closer links with key partners, including the social partners at European, national, regional and sectoral levels, taking into account social partners’ ‘Framework of actions for the lifelong development of competencies and qualifications’....”

The European Union ‘meta-qualifications’ process is an ambitious program which places industry preparation at the heart of economic policy. This is relevant, given the apparent alignments flagged for higher education in the region with the Bologna initiatives. This issue formed the basis of Asia-Pacific Education Ministers committing to the ‘*Brisbane Declaration*’, announced by the Hon. Julie Bishop MP, Minister for Education, Science and Training, at the April Ministerial meeting of in Australia.

Recommendations

TAFE Directors Australia has based its advocacy for improved diversification to university accreditation protocols on economic ground, and building an improved platform for the TAFE brand to provide the 'next phase' in innovative educational synergies for skilling with Australian and international industry into the 21st Century.

Research from ANTA was indicative that the TAFE brand in Australia is a trusted and confident part of our educational and industry skills framework. Research confirmed TAFE as the provider highly trusted by industry for quality vocational training and education – especially in highly skilled, accredited training and in areas of new skill needs. Employer research from NCVET (2004 and 2005) confirmed employers were highly satisfied with TAFE as a provider, and for accredited training in 2005 TAFE outperformed private providers in satisfaction rankings. The May 2006 Ai Group Employer Survey showed significant improvements in employer satisfaction with private and public providers, and the highest improvements recorded for TAFE. TAFE at a national level is ideally positioned to meet the further educational demands of its client base.

TDA as the national peak body for TAFE colleges and institutes proposes that the current structures have created unacceptable borders to delivery of new innovative and higher skilled courses for our industry and SME client base - so much in need of highly focussed skilling pathways. The singular structure to TAFE narrows delivery, and prompts existing students and alumni wishing to up-skill to outsource their training beyond TAFE, which had been hitherto trusted for this sector's quality training and accreditation.

TDA proposes five (5) reforms to be articulated in this review:

Recommendation I - Pathways for VTE to be self-accredited higher education providers, and open to TAFE institutions

Recommendation II - Pathways for specialist universities to be open to TAFE institutions

Recommendation III - Creation of "University Colleges" as specialist innovation academies, to be open to TAFE institutions

Recommendation IV - National Consistency and Accreditation, with a National Accreditation Agency to be supported. We advocate an audit process to be incorporated within this single body, and the various quality frameworks (AQTF, NCOS & AUQA) aligned within this national agency.

Recommendation V – Dual sector Working Group appointed to review definitions of the Protocols criteria, to ensure clarity for higher education and VTE education providers.

SUMMARY

The aim of any changes to the National Protocols for Higher Education Approval Processes should be to create restructured Protocols that improve the diversification of Australian tertiary education. It is clear that the current model has not worked and that proposed changes may not deliver the innovative environment so clearly demanded across the economy without consideration toward greater diversity and focus on skilling and client demands.

TAFE Directors Australia

09 May 2006