

CHIFLEY BUSINESS SCHOOL

Secretariat
Review of Australian Higher Education
GPO Box 9880
Canberra
ACT 2601

Dear Secretariat

Thank you for the opportunity to the Higher Education Review Panel.

This letter responds to your invitation to provide a brief submission to follow up points made in discussion. It covers two aspects.

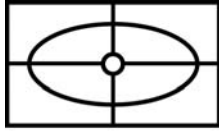
First, it reiterates desirable regulatory arrangements. Second, it canvasses innovation through specialist and commercial independent provision.

Regulatory arrangements

The concept of a seamless national regulatory regime for higher education is good. Multiple regulatory processes constitute an unreasonable burden on private providers, unnecessarily compounding the competitive disadvantage against the larger resources and self-evident standing of public universities. Further, as a business school serving the needs of technical professionals through distance education – from Australian engineers working on projects in the Gulf one year then on to the next project in Europe the following year, to professional planners building careers in a range of remote local governments across Australia - we are particularly conscious that the notion of 'local' qualifications is nonsense. Careers are global.

There are a number of requirements for a good national regime as far a quality private provider is concerned:

- Especially valuable would be a single, self-explanatory, government warrant along the lines of '**Approved Australian Higher Education Institution**' which can be displayed by non-universities in local and global marketplaces. The alternative, from experience, is relying on a long-winded demonstration that accreditation is state-based but recognised under 'national protocols', or having to explain that CRICOS registration meets a different purpose and is not a proxy.
- It is essential that all processes are integrated such that access to registration, accreditation and access to HESA limits the cost, time and paper burden, and mitigates the risk of 'double jeopardy' (ie approval through one process but not the other). We are currently going through the long process to gain FEE-HELP access for our students (previously available through a university partner), and it is especially galling to



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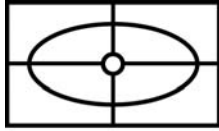
have to provide much of the same material, though cast in a different form, as was provided for re-accreditation only 12 months prior.

- It is just as essential that the process demands are absolutely fit-for-purpose having regard to the particular 'licence' sought. For example, it would be unreasonably oppressive to require the full AUQA process designed for the university context for specialist private providers; equally, where an institution has demonstrated its quality and stability through performance over time or through a number of regulatory rounds, some form of credit for that standard by way of a less time and paper-intensive process for continuing licensing would be appropriate.
- At the same time, a transparently rigorous standard in respect of learning and assessment quality is absolutely required to secure the reputation of Australian higher education. The position of a private provider is much more vulnerable than that of universities to the market perceiving that Australian higher education cannot always be trusted - even those universities whose product is known to be weak. But administrative simplicity and rigour in assessment need not be contradictory.

Innovation

Specialist, commercial higher education providers with close connections to their business, industry and professions comprise a driver of innovation for Australian higher education. The experience and current practice of Chifley Business School provide good illustrations (although we are by no means alone in this):

- In the 1990's Association of Professional Engineers, Scientists and Managers, Australia (APESMA), Chifley's owner, developed an MBA and related awards by distance education to provide a low-cost, accessible, relevant program for technology professionals, typically in full-time work, to assist their moving into management or private business in the context of fundamental restructuring of the Australian economy. The program grew to be the largest MBA by enrolment in Australia – at its peak representing 40% of total enrolments. While APESMA eventually developed the program in conjunction with Deakin, it is important to understand that APESMA was the program's progenitor and maintained the core accreditation and intellectual property throughout. In response, a number of Australian universities have developed similar programs, transforming the market.
- That said, Chifley is still advised privately by a number of universities that they would have great difficulty recreating the quality of materials which lie at the heart of the MBA, primarily because under the university model, control of content is in the hands of academic staff. This discipline is driven by commercial necessity; that is our knowledge that the professionals taking our courses are free to source elsewhere.



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- A commercial, demand-driven approach to higher education and proximity to corporate and professional customers generates current innovation in content and delivery, and also articulation. In particular, Chifley now provides tailored graduate certificate programs to groups of staff of corporate clients, comprising blended (ie distance and face to face components) delivery and including company-specific materials to address their change needs. This provision has emerged from Chifley's corporate activity at VET diploma level, whose success has depended greatly on upfront development work with the company concerned so as to capture both company need and company knowledge. At the same time, Chifley's practice is to encourage recognition of structured company workplace learning at VET level by providing appropriate credit and also to offer continuation of the individual's studies through access to distance-based learning. Critical to success with corporations and professionals is the business credibility of Chifley's distance and face to face teaching staff, all of whom provide their services on a part-time contract basis and have current or previous business or professional experience. (Chifley's diagram illustrating the process of knowledge capture, also forwarded with the ACPET submission is attached)
- Importantly, Chifley has brought a number of Australian universities into corporate provision of this more responsive kind through hard-nosed commercial alliances. We have taken the view that if the costs of development of particular learning product or experience prohibit our delivery at commercial rates, and a university has it 'off-the-shelf', we will join with that university.

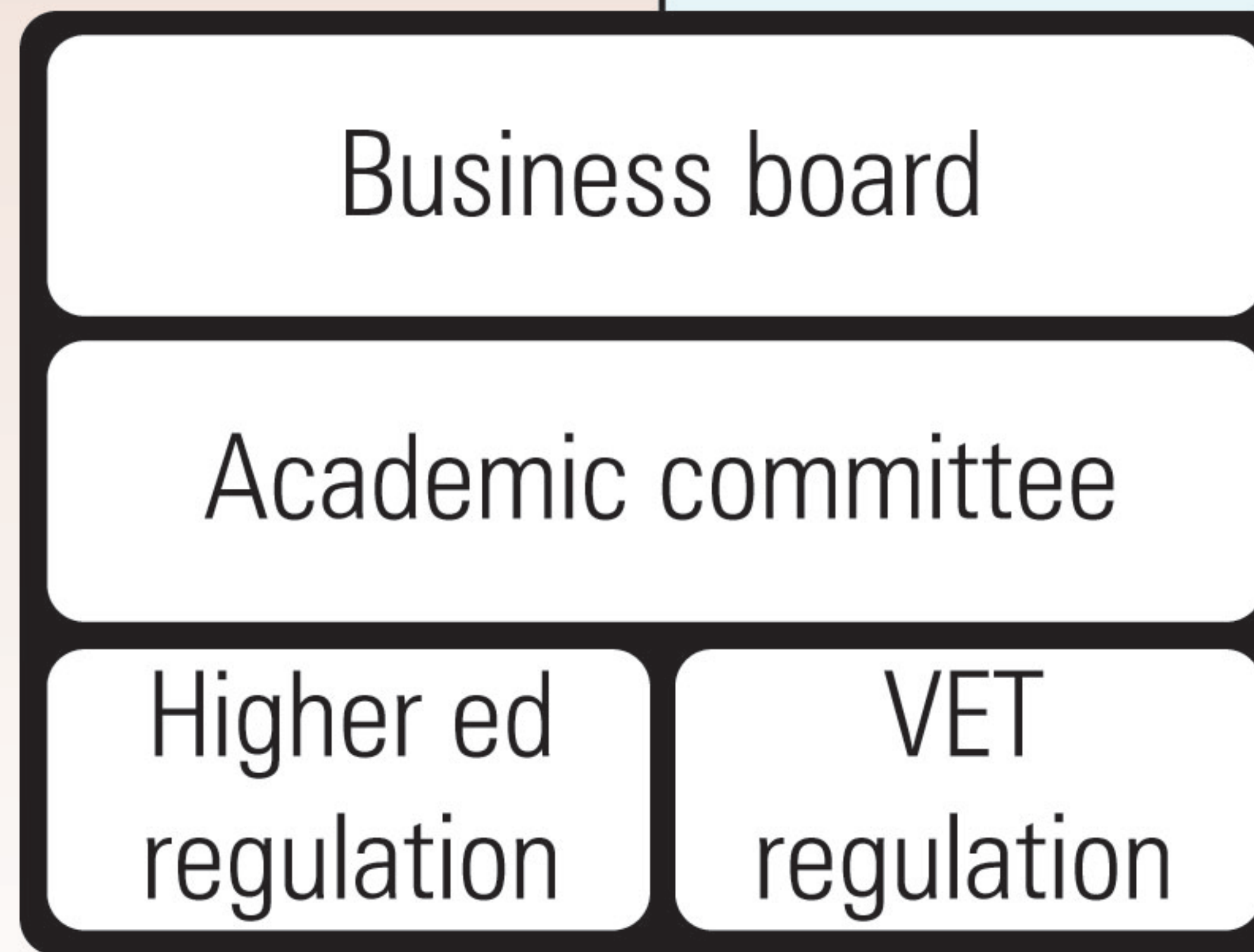
I trust that these summary comments will assist your work for the inquiry. Feel free to follow them up with a telephone call - 0396958878 or 0407560796 - or email - nedwards@chifley.edu.au .

Kind regards

Neil Edwards
Chief Executive
30 July 2008

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Expert customers



Industry-based teachers

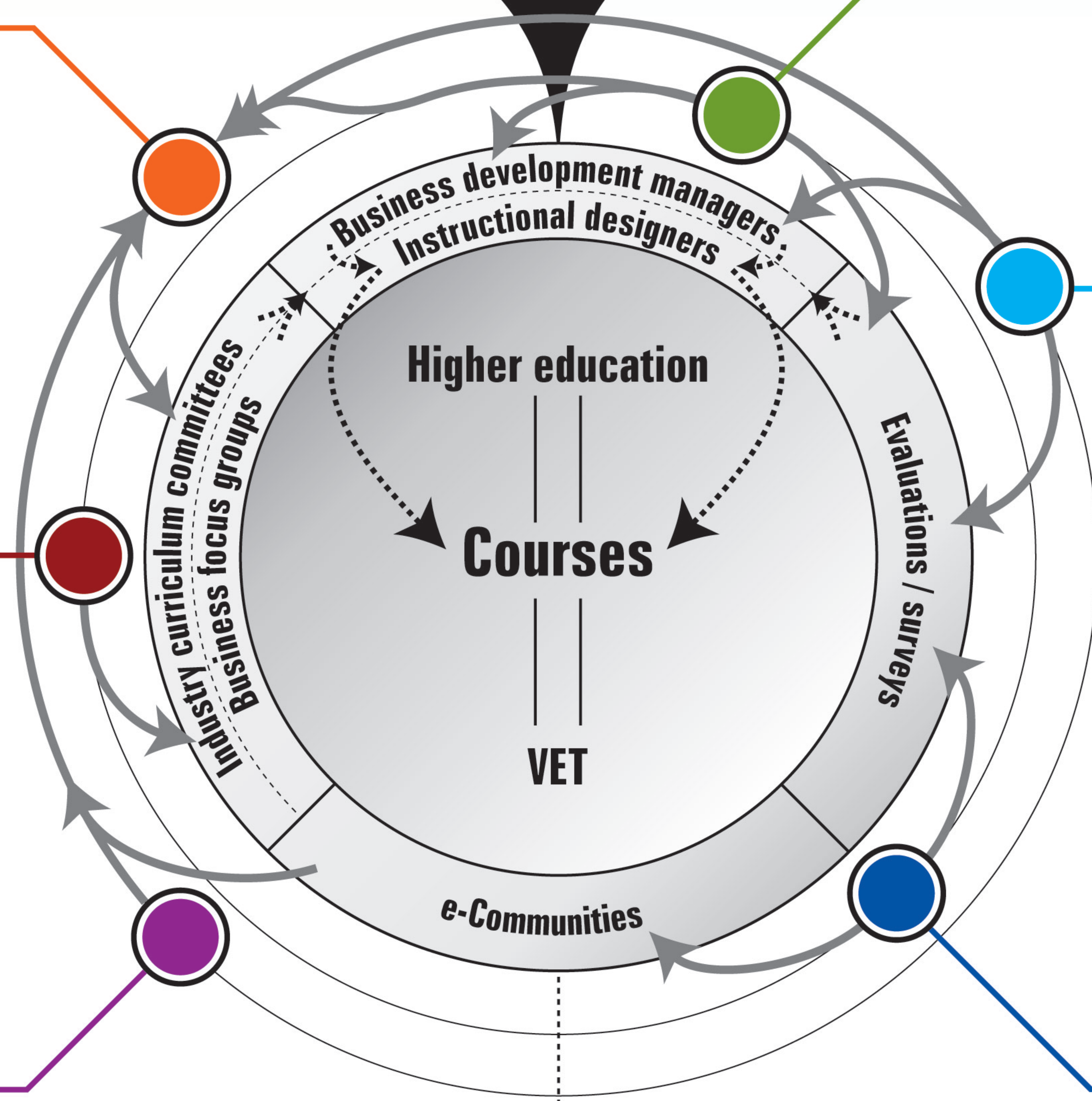
Professional groups

Corporate clients

Industry intellectual property owners

Professional bodies

Course participants



Demand-driven continuous loop
Knowledge capture