

Navitas submission to the Bradley Review of Higher Education

Thank you for the opportunity to input to the considerations of the Review committee. Navitas College Directors and Academic Directors have been part of consultations with the review panel in New South Wales, Victoria, Queensland, South Australia and Western Australia. The content of this submission focuses on those areas where Navitas believes it can make the most significant contribution.

Navitas Background

Navitas Ltd (formerly IBT Education) commenced operations in 1994 and has since grown to be a successful and vibrant Australian-based transnational provider of education and related services. Navitas operates across the traditional sectoral boundaries that define higher education, vocational, English and secondary education. It delivers AQF qualifications from Certificate I through to Masters Degree.

Navitas is a globally connected company offering increasingly integrated education and training solutions. Through its partnerships with universities, industry and government Navitas' objective is to maintain a 'trusted, whole of learning life' relationship with students and partners.

Navitas offers:

- University pathway and managed university campus programs for students studying in Australia, Sri Lanka, Singapore, Kenya, Zambia, Canada, Indonesia and the United Kingdom;
- English as second language courses for international students and English language settlement and work preparation programs for migrants and refugees;
- Education, training and business solutions to employers to meet their requirements for 'work-ready', skilled employees, and to provide learners and clients with relevant, practical tertiary and vocational skills, work experiences and support in their career development and working lives; and
- Recruitment of students for educational institutions in Australia, Canada, the US and the UK through major networks in China and India.

Navitas Comment and Responses

Q1	How adequate is the statement of functions and characteristics of higher education in modern Australia?
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Navitas is of the view that the statement of functions and characteristics of higher education in modern Australia outlined in the Discussion Paper are relevant and appropriate however we would argue that, the core function of *'developing high level knowledge and skills'* and the identified characteristics are applicable to tertiary education, including vocational and continuing professional education, rather than the province of higher education.

Q5	Are there particular examples of good practice where you can demonstrate either rapid response to skill shortages or successful initiatives to improve generic skills?
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1. The success of Navitas University Programs Division has been built on its ability to provide opportunities to those students who have not met direct entry to universities. This is usually because the student has yet to reach the university's academic and/or English language requirements. The Navitas model is to partner with a specific university and in the majority of cases the Navitas College is situated within the precinct of the university's campus. Navitas colleges are dual sector and offer the Certificate IV in University Foundation Studies and a higher education Diploma in a wide range of disciplines. The diploma level course consists of units offered as part of the first year of bachelor programs at the host university. For example, PIBT Diploma of Business units are the same as the first year units of ECU's Bachelor of Business.

The focus of Navitas colleges is to provide international and domestic students with a program of study that assists them with the transition to the higher education system. This transition takes place through smaller class sizes, intensive learning environments, a trimester delivery model, and support classes to assist students achieve their potential. In this way students are provided with a 'pathway' to the second year of bachelor level courses. Pathways to university masters courses are also provided for international students.

Attachment 1 describes the Navitas model in more detail.

2. Navitas' active pursuit of partnerships and innovative collaborations with universities, industry and Government, has enabled the development of a model that connects and operates across traditional sectoral, State and national boundaries. It allows Navitas and its partners to focus on core competencies and provide rapid and flexible responses to emerging needs and requirements, e.g. increased participation in higher education, 'work-ready' graduates, increased social and workforce participation by newly arrived migrants and refugees.

Regulation and Compliance

Q31	Is it time to reshape tertiary education in Australia and streamline financing and regulatory arrangements? If so, what structural changes would you make and why?
Q32	Is the level of regulation in the sector appropriate? If not, why not, and what should be done to reduce the level of regulation?
Q33	Does Australia's Quality Assurance Framework need revision? If so, why? What changes would you make?
Q34	Are changes required to the Australian Qualifications Framework?

The Review Panel acknowledged during recent discussions with private providers that the Panel has some clear thoughts on the issue of regulation and compliance. Suffice to say Navitas would support any recommendations from the Panel that would streamline the regulation, accreditation and compliance workload on its colleges.

The framework in which educational institutions operate is complex and spans both Commonwealth and State-based legislation. While the aims of the framework are laudable and desirable, the reality for a large number of institutions is that the current regulatory structure creates duplication, inconsistency and inefficiency.

As most Navitas colleges are registered higher education institutions as well as Registered Training Organisations under the VET system, and offer courses to overseas students they must comply with the National Code of Practice for Registration Authorities for Providers of Education and Training to Overseas Students and must be registered for this purpose. The overlap of each of these regulatory practices and the waste of public and private resources is self evident. It is not unusual for a private provider to submit the same information, albeit in different formats to the same state department four times over the course of 12 months.

In addition, the track record of non-self accrediting institutions appears to play no part in the requirements laid down by registration/accrediting bodies. For example, a college that has operated successfully as a higher education provider for over 15 years, and has an exemplary profile with the State authorities still has to submit re-registration applications as if it is a start-up provider. A regulatory environment that rewards private institutions for a track record of quality and compliance would be greatly appreciated.

The time taken to accredit higher education courses is also a substantive issue for Navitas colleges. Well run universities can now accredit a new course in around six weeks. For a non-self accrediting higher education institution it takes at least six months to get a new course accredited through its state accrediting body. Six months is stipulated by many state departments (i.e. Western Australia). Nine months is stipulated by other states (i.e. Queensland). When factoring in the time taken to:

- develop the course curriculum material,
- put together the significant documentation required as part of a course accreditation application,
- go through the course accreditation process (six months minimum), and
- subsequently, following course approval, market and recruit students for the course

Around 18 months (78 weeks) has elapsed since a market niche is first identified. This situation makes responding to student needs and market forces in a timely manner almost impossible, and gives self-accrediting institutions a significant competitive advantage over non-self accrediting institutions.

The categorisation within the AQF of post-secondary education as *higher education* and *vocational education* has becoming increasingly artificial and led to rigidity in regulation, thinking and approach, particularly in its application to international education. For example, an institution that is not a higher education provider (either self-accrediting or non-self accrediting) may only issue AQF qualifications as a *vocational* Registered Training Organisation, under the AQTF. Navitas delivers AQF Certificates III and IV and a Diploma in English for Academic Purposes for international students, which are classified as VET qualifications. The AQTF was developed to regulate the registration of Australian domestic vocational training providers and to accredit domestic vocational training courses. It has subsequently been applied to non-higher education providers (both international and domestic) seeking to offer formal qualifications, whether the area of study is relevant to the VET sector or not.

Recommendation 1:

That the Panel consider a hierarchy of registration that facilitates a reduction in re-registration and re-accreditation costs proportional to the time an institution has been registered.

A system of on-line registration and accreditation that allows institutions to upload or hyperlink to their registration and accreditation documentation on a database is proposed. This database could then be available to all registration authorities for ad-hoc and regular desk audit. Those institutions requiring follow-up could be identified and approached and those institutions that are compliant need not undergo further scrutiny.

Recommendation 2:

That the Panel consider a regulatory environment in which there is a hierarchy of accreditation processes for non self-accrediting institutions.

That is, those institutions that have undergone successful accreditation over a number of years (this can be stipulated) are not subject to processes that require substantiation of rudimentary accreditation requirements. For example, a well established college could undergo a desk audit of accreditation documentation and a Higher Education Advisory Committee is constituted to focus on applications for content or award level concerns.

Recommendation 3:

That the Panel review the relevance of the sectoral division between vocational education and higher education qualifications and consider a tertiary sector which encompasses all post secondary qualifications and which provides a more relevant categorisation of non-higher education courses.

Enabling Success

Q10	What institutional initiatives have proved successful in increasing low SES or Indigenous participation and success? (Please provide information about outcomes as well as activities.)
Q29	To what extent are the current funding models adequate to secure the future of Australia's higher education sector? If there are better models, what are they?

Navitas colleges have a long-established track record of successfully providing enabling courses for students requiring an alternative entry to university. The Navitas approach is to provide an intensive learning model supplemented by support classes in English language, communication skills, information technology and mathematics. In addition, Navitas has accredited its own Certificate IV in University Foundation Studies. This Certificate IV is offered to students who need additional academic skills and knowledge prior to commencing a diploma level award.

As a result students who enter university via a Navitas college have broadly equivalent pass rates at university as those students who enter university directly, evidenced by the tracking university partners have undertaken. Indeed, these tracking studies are a vital component of Navitas' quality assurance.

Navitas believes its success at assisting international and domestic students to reach their academic goals could be used to increase the numbers of students from low socio-economic status, NESB and other equity groups wishing to make the transition to university. Currently, the Fee-Help arrangements available to Navitas college students are not attractive enough to recruit significant numbers of equity group students to Navitas colleges. Navitas believes allocating commonwealth supported places to private colleges to provide 'enabling' level and diploma level courses to equity group students would lead to increasing numbers of equity group students making a successful transition to university. Navitas believes such allocations should be to higher education institutions able to demonstrate a history of its students achieving unit pass rates similar to the broader target university population.

Recommendation 4:

That Commonwealth Supported Places for defined equity group students be competitively allocated for enabling studies (at Foundation and Diploma levels) at private higher education institutions that can demonstrate a track record of its students successfully graduating.