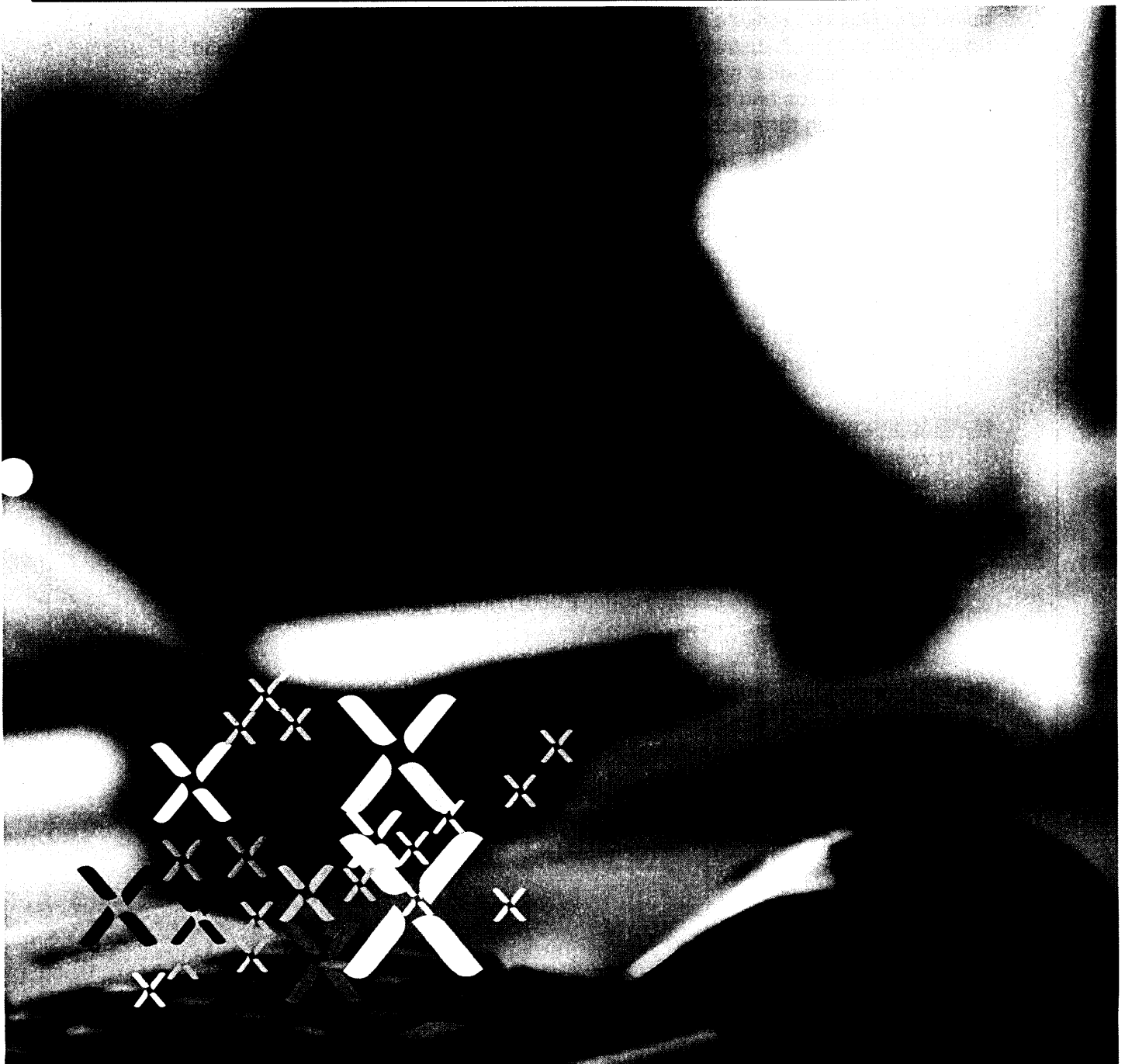




Global Educators™

Submission to the Review of Australian Higher Education



Introduction

This is a submission response by Box Hill Institute to the Discussion Paper of the Review Panel on Australian Higher Education. Box Hill Institute is an Institute of Technical and Further Education (TAFE) and a government funded Registered Provider (Registered Training Organisation) of vocational education and training (VET). Box Hill Institute is approved by the Victorian Department of Education and Training pursuant to the Victorian Tertiary Education Act 1993 as a private provider of higher education courses. Further, Box Hill Institute has been approved by the Commonwealth Department of Education, Science and Training under the Higher Education Support Act 2003 as a Non Self-Accrediting Higher Education Provider.

Purpose and structure of the submission

The submission by Box Hill Institute addresses some of the key issues identified by the Review Panel in its Discussion Paper on Australian Higher Education. The purpose of Box Hill Institute's submission is to address issues that affect an underpinning goal of Australia's higher education system, namely to be a broad based tertiary education system that produces professionals for national and local labour market needs and contributes to the innovation and productivity gains required for Australia's long term economic growth.

Box Hill Institute has responded to the following question areas in the Discussion Paper as being broadly relevant to its delivery as a higher education provider of applied degrees. Its response includes six recommendations which are collated in a concluding section.

Higher education in modern Australia

1. How adequate is the statement of functions and characteristics of higher education in modern Australia?

Meeting labour market and industry needs

6. How effectively are Australian higher education institutions responding to demographic change, especially in providing lifelong learning to meet the challenge of the ageing population and the need for upgrading of skills and re-training?
7. What is the relevance and applicability of the findings and approaches proposed in the United Kingdom paper, Higher Education at Work, for increasing skills levels in the workforce to Australia?

Opportunities to participate in higher education

8. Should there be a national approach to improving Indigenous and low SES participation and success in higher education?
9. If you support a national approach to improving Indigenous and low SES participation and success how do you see it being structured, resourced, monitored and evaluated?

The student experience of higher education

14. How do institutions measure the quality of their learning outcomes and how do they know they are nationally and internationally competitive?

Connecting with other educational and training sectors

15. To what extent should vocational education and training and higher education continue to have distinctive missions and how should these missions be defined?
16. Does the movement between the sectors of students with credit need to be improved? If so, in what ways?
17. What are the effects of current differences on funding, governance and regulation in limiting planning or influencing choice between the sectors?
18. Can institutions provide examples of good practices which have led to movement between the sectors with high levels of credit and good learning outcomes?

Resourcing the system

28. What incentives or unintended consequences are there in the current arrangements for higher education funding?
30. Are the current institutional arrangements for determining relative funding between higher education institutions appropriate? If not, what changes should be considered?

Governance and regulation

31. 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?
32. Is the level of regulation in the sector appropriate? If not, why not, and what should be done to reduce the level of regulation?
33. Does Australia's Quality Assurance Framework need revision? If so, why? What changes would you make?
34. Are changes required to the Australian Qualifications Framework?

Background

Over many years Box Hill Institute has built considerable institutional capability for delivering education and training programs across a wide range of industry areas. These include electronics, information and communication technologies, business and management, engineering, building, hospitality and tourism, hair and beauty, manufacturing and automotive, biotechnology and science, multimedia, performing arts, health and community services.

Box Hill Institute has expanded in the global education market and has alliances with industry and partnerships locally and internationally. It offers training and education that incorporates industry experience using a network of enterprise partners and offers overseas study experiences.

In 2004 Box Hill Institute had its first degree program accredited by the Victorian Department of Education and Training and gained registration as a private provider of higher education courses.

A further four degree programs have since been successfully accredited and the Institute currently delivers fee-based degrees in Applied Music, Applied Business Management in Music Industry, Computer Systems (Networking), Hospitality Management and Biotechnology & Innovation, and two Associate Degrees in Fashion Technology and Commerce.

In 2006 Box Hill Institute was approved by the Commonwealth Department of Education, Science and Training as a Non Self-Accrediting Higher Education Provider.

Box Hill Institute, as a TAFE provider, aligns with the global trend to position higher education more closely with workforce needs by developing applied degrees. These applied degrees are designed to meet the emerging needs of the workplace, the professional development needs of employees and have multiple entry points.

Box Hill Institute responds to the 'new tradition' of higher education of accessibility, flexibility, adaptability, integration and responsiveness that is emerging to address the varied service needs of employers and employees, and to be relevant to the context of professional practice in the workplace across all employment sectors ¹

Box Hill Institute adopts an innovative approach to its teaching, industry, local community and small business relationships. The Institute successfully balances the local needs of students and industry in the eastern metropolitan region of Melbourne with that of the global business environment.

In 2006 Box Hill Institute was:

- Winner of the Victorian Governor's Export Award for Education
- Recognised at the Australian Export Awards as Australia's best exporter of education and training. Normally awarded to universities this was the first time a TAFE institute won this prestigious honour
- Winner of the Yarra Valley Award for Excellence in a Large Business, winner at the Whitehorse Business Awards and the Excellence in Business Awards and a finalist for the Mayoral Award for Corporate Citizenship
- Winner of three of fifteen awards that recognised achievements over 10 years at Cisco Asia Pacific Academy
- The first Australian TAFE to sign an applied research agreement with a US Company, PaleoTechnology International Inc, to provide applied research opportunities to biotechnology students providing \$6m in sponsorship, equipment and student scholarships over five years
- Responsible for three specialist centres in training to Small to Medium Enterprises, Information and Communications Technology and Biotechnology
- Granted \$4.5m of State Government funding towards a Nursing Skills Centre of Excellence with partners Deakin University, Epworth Private Hospital and Eastern Health
- Recognised as the leading hospitality training organisation and selected by UK celebrity chef Jamie Oliver to train the Fifteen Restaurant trainees
- Signed of a number of training MOUs with partners including the Molecular Plant Breeding Cooperative Research Centre, the Howard Florey Institute and the Victorian Partnership for Advanced Computing

¹ Wedgwood, 2007, Higher Education for the Workforce: Barriers and Facilitators to Employer Engagement, Department for Innovation, Universities and Skills, UK p. 24

- Signatory to an agreement with EMAAR Properties to provide TAFE programs to Raffles Campus worldwide and a Kuwait campus for women.

In 2007 Box Hill Institute was:

- Awarded for the second year the Governor's Export Award (Education Category)
- Finalist in the Australian Export Award (Education Category)
- Winner Australia-China Business Awards (AustCham) in two categories (Business Excellence Award, Sustainable Development Award).
- Doubled enrolments in existing degree courses and introduced a new hospitality management degree and fashion technology associate degree whilst developing early childhood education and music business industry degrees
- Launched the PaleoTechnology Laboratory
- Commenced training at the Commonwealth Government funded initiative, the Australia Pacific Technical College.

Higher education in modern Australia

Question 1. How adequate is the statement of functions and characteristics of higher education in modern Australia?

Box Hill Institute agrees with the statement of functions proposed in the Discussion Paper. In particular it agrees that an important statement of higher education functions in modern Australia is to prepare a highly productive professional labour force alongside the VET sector. To this end Box Hill Institute looks for greater government recognition of the role of TAFE institutes which offer applied degrees in a quality environment and which can support government directions in terms of strategic goals and skills shortages.

Box Hill Institute also agrees that, as a major knowledge-based industry in its own right, higher education alongside the VET sector makes essential contributions to building the national economy and regional economies within Australia. The Institute has a mission to execute this goal and its own achievements as a knowledge-based industry are well recognised.

Box Hill Institute further agrees with all of the seven listed characteristics of higher education in modern Australia. However the Institute is concerned that the current cumbersome learning pathways and sector divisions restrict opportunities for all students to participate and that they further thwart the effective connection of education and training sectors.

Additionally, Box Hill Institute looks to greater government awareness of the vital role TAFE institutes can play in the national research and innovation system and their need to have improved access to research and innovation funding.

Meeting labour market and industry needs

Question 6. How effectively are Australian higher education institutions responding to demographic change, especially in providing lifelong learning to meet the challenge of the ageing population and the need for upgrading of skills and re-training?

The TAFE sector recognises the demographic changes that are expected to impact on the Australian training landscape including the challenge of an ageing population that will require upgraded skills and re-training (particularly with technology changes in the workplace) as well as the increased mobility of the population which requires transferable qualifications. TAFE institutes such as Box Hill Institute now deliver specific training for mature age workers with a focus on technology training. This training is about delivering career flexibility as well as increasing the qualifications profile of the existing workforce.

The Discussion Paper reflects on the increasing age of students. In many instances this is due to a return to study when university graduates find that they do not have the work ready skills required to fulfil their professional role.

Box Hill Institute has a number of students who enrol to gain these practical skills. Some transfer during their degrees and others attend after completing a university degree to complement their qualifications before entering the workforce. Other students attend part time once they have started working, having discovered they need additional skills not supplied by the university system. An example is described by a higher education teacher from the Institute's Centre for Biological and Animal Sciences:

At University level with very high student numbers in a science course many may never get a hands-on laboratory experience. Techniques are taught in demonstrations only; the students do not get to do an experiment. Graduates then may have excellent theoretical knowledge but they are under equipped in respect of practical skills; they have difficulties in finding a job not able to perform basic experimental techniques. Students enrol in our degree courses to close this gap and improve their chances in the job market.

The example indicates a need for a more industry driven and applied curriculum to meet the needs for a skilled workforce, with industry internships and projects forming an important part of the applied degree structure.

Question 7. What is the relevance and applicability of the findings and approaches proposed in the United Kingdom paper, Higher Education at Work, for increasing skills levels in the workforce to Australia?

As tertiary education teaching institutions the TAFE sector in Victoria is similar to polytechnics in other OECD countries. Polytechnics have in common with the TAFE sector the central objective to provide both applied academic and practical qualifications. The common focus is to teach applied knowledge and skills for employment that is referenced to business, industry and enterprise requirements. Both TAFE institutes and polytechnics can confer academic degrees; Victorian TAFE degrees are accredited and quality assured by the Victorian Registration and Qualifications Authority (VRQA).

Within the TAFE system the referencing of curricula to business, industry and enterprise requirements is directed by Industry Skill Councils who are responsible for the production of industry criterion-based Training Packages. However polytechnic

models in the European Union and North America, when developing curriculum responses including national standards, draw on a range of inputs from industry.

There are other similarities however Box Hill Institute believes that an Australian polytechnic model would more effectively deliver TAFE higher education programs to meet the needs of employers and employees. In an Australian polytechnic model curricula would be developed to interpret training package performance criteria into learning outcomes within an applied vocational learning pedagogy. Knowledge construction would be designed to more fully support student transition from Advanced Diploma to undergraduate degree programs. Courses would be highly valued in the job market with vocational and key skills developed through work experience and applied learning projects.

TAFE Institutes would operate within the Australian polytechnic model to provide higher education programs whilst retaining their traditional role and responsibility as a VET provider. The polytechnic model builds curriculum strength with a range of professional and industry input and is designed to deliver a workforce with the requisite and congruent industry skills that meet the needs of employers. Credit transfers between an Australian Polytechnic and a university would be more easily facilitated and promoted. Similarly an instrument such as the VRQA Credit Matrix could be more easily applied by having industry input involved in curriculum development at the broadest level rather than limited to Training Packages.

Evidence suggests that where a broad tertiary sector that genuinely embraces vocational education and training is created alongside the academic sector, where both the range of courses available and the supportive culture of the new tertiary institution is improved, and where a strong, applied learning style connected to work is developed, then there is an increase in retention, participation, and qualification rates. Achieving a qualification that is meaningful for their career will encourage student participation. (Department of Education, Tasmania, 2008)

Recommendation 1

Box Hill Institute recommends the adoption of an Australian Polytechnic Model similar to that in other OECD countries. The model would enable industry curriculum development to be sourced from a range of industry sources to focus on individual curriculum needs.

This recommendation could form part of a broader approach of restructuring both the higher education and VET sectors. BHI considers that there is merit in a system which includes:

- A smaller number of research only universities;
- A range of teaching and learning universities ;
- A polytechnic model incorporating a small number of TAFE providers offering a broad range of programs including Bachelor degrees and applied research;
- A system of community colleges meeting local needs;
- Secondary schools which have as an element a specialist stream in areas of particular vocational focus or other areas of speciality.

Recommendation 2

Box Hill Institute recommends those TAFE providers with extensive experience in delivering a full range of qualifications from Certificate level to Bachelor qualifications should be approved as Polytechnics.

Any move to this model should be done on a voluntary basis with the Commonwealth government giving incentives for organisations to make such moves. Eligibility criteria would need to be established for each group.

Opportunities to participate in higher education

Question 8. Should there be a national approach to improving Indigenous and low SES participation and success in higher education?

Box Hill Institute believes in a national approach to improving indigenous participation in applied higher education. A national approach to educational funding to indigenous peoples was adopted two decades ago as a result of the national indigenous education and training policy². This policy was successful for the reasons that:

- it enabled indigenous people to become involved in education decision-making
- government resourcing arrangements ensured that education and training authorities would be required to fund educational services to indigenous peoples under mainstream funding arrangements as for other Australians.

Education and training authorities and institutions around Australia had a clear obligation to provide appropriate education and training places to indigenous people in those situations where it had not previously been occurring. This is the basis for a national approach to improving indigenous education participation and, in the present time, participation in higher education that is practical and applied.

Question 9. If you support a national approach to improving Indigenous and low SES participation and success how do you see it being structured, resourced, monitored and evaluated?

TAFE institutes are best able to deliver such equitable education and training policies for indigenous peoples, in particular applied education that is accessible at both the VET and higher education program levels. The most critical issue for future improvements to indigenous education and training participation and success is to ensure that education and training encourages indigenous peoples to achieve outcomes which are compatible with their cultural and social needs.

These are outcomes of training for employment to take a full role in Australian society, to improve indigenous wellbeing and to address indigenous disadvantage. Dockery and Milsom (2007)³ point out that whilst government policy stresses the importance of self-determination and cultural preservation in promoting indigenous wellbeing...

at evaluation stage, objectives such as self-determination and choice have been ignored or have been replaced by more easily quantifiable objectives, such as increased numbers of Indigenous people in

² NCVET, 1998 Making a difference: The impact of Australia's indigenous education and training policy

³ Dockery, A and Milsom, N. 2007 *A Review of Indigenous Employment Programs*. National Centre for Vocational Education Research

mainstream jobs. Policy-makers need to pay greater attention to how programs are evaluated.

Dockery and Milsom emphasise that the education and training programs provided to indigenous peoples must have a focus on skills and knowledge development that will include outcomes of improved individual well-being. TAFE programs have been consistently identified as embedded in community goals and responsive to community needs. TAFE programs are structured to facilitate the ongoing contributions of the indigenous community to the development of their education and training outcomes and to establish evaluations that are aligned to these outcomes.

Recommendation 3

Box Hill Institute believes that applied higher education may be most appropriate to indigenous participants, and recommends that national funding be made available to TAFE institutes as primary providers to support such participation.

The student experience of higher education

Question 14. How do institutions measure the quality of their learning outcomes and how do they know they are nationally and internationally competitive?

The quality assurance of publicly funded self-accrediting higher education institutions is the responsibility of the Commonwealth Government. The quality assurance process has been to engage self-accrediting institutions in a quality audit conducted by the Australian Universities Quality Agency. The premise for engaging with the audit process is that institutions, bound by the Higher Education Protocols and the parameters of the Australian Qualifications Framework, have established their own standards against which they will be audited following a self-review.

External quality audits of non self-accrediting higher education providers are the responsibility of state governments and in Victoria are conducted by the Higher Education Regulation Division (HERD), part of the Victorian Registration and Qualifications Authority. The quality assurance process required by HERD for new higher education providers is to prepare and submit a description of their quality systems, for discussion during a site visit if selected.

The Quality Systems Description document developed by the non self-accrediting higher education provider is to be based on information required for applications for re-authorisation to conduct higher education degree courses. It is to describe quality systems and processes put in place by the provider to assure the quality of courses and activities, improvement planning, and arrangements for action to remedy significant problems. Unlike the AUQA audit requirements, it does not require information on institutions governance, research activities, stakeholder involvement, career development, administrative or financial systems.

Box Hill Institute successfully underwent its first HERD audit in 2007 and drew on its own internal Quality Framework and quality assurance and review processes to identify HERD requirements of significant events and achievements, quality systems and improvements, graduate outcomes, enrolments, pass rates, completions, organisational reports and organisational data.

Box Hill Institute has developed a Quality Framework that focuses on core functions of its higher education provision, namely its quality delivery in teaching and learning and its commitment to quality improvement. The Quality Framework is a resource

manual for determining the quality requirements for the planning, design, delivery, evaluation and improvement of courses and subjects.

To assure quality Box Hill Institute analyses student outcome indicators collected through data from an internally developed student experience questionnaire. The questionnaire survey data is used in the annual review of every higher education course offered within the Institute.

Another vehicle for the measurement of quality at Box Hill Institute are Course Advisory Committees (CAC). A CAC has oversight of a degree area and provides direction and comment on the course in terms of learning outcomes, industry relevance and academic rigour. The CAC is uniquely placed to help higher education course leaders and Centre Managers meet the expectations of industry and the wider higher education sector.

The CAC's aim to include in their membership leading industry professionals who are aware of the latest industry developments and who, with their higher education counterparts, input into the requirements for quality teaching and learning in higher education.

With regard to benchmarking standards for higher education related activities such as teaching and learning, research, finances, internal management and internationalisation, self-accrediting higher education institutions can identify and establish benchmarks through comparative exercises with other institutions, from data on student outcome indicators collected through the national Course Experience Questionnaire and Graduate Destination Survey, or through the assistance of publications such as McKinnon et al, *Benchmarking: a manual for Australian Universities*⁴.

The challenge for non self-accrediting higher education providers, particularly a TAFE institution, is to determine relative standards. It is difficult for a TAFE institute such as Box Hill Institute to access other organizations that are similar enough to make benchmarking a viable and reliable exercise. However Box Hill Institute is pursuing the benchmarking of its educational approaches around a discipline area by a national comparison of similar courses offered by targeted private providers. The Institute's organisational activities are being benchmarked with Deakin University which, as part of a partnership arrangement, is examining a range of administrative areas such as student selection and processing, library services, complaint handling and equity group enrolment.

Connecting with other educational and training sectors

Question 15. To what extent should vocational education and training and higher education continue to have distinctive missions and how should these missions be defined?

Box Hill Institute supports the continuance of the distinctive missions of vocational training and higher education. The VET sector is strongly aligned to the needs of industry and this places the TAFE system in a unique position to assist with the demands of Australia's current skill shortages and the predicted skill shortages of the future. The delivery of degrees in a TAFE environment adds weight to this position. The VET sector is well placed to concentrate on the delivery of undergraduate

⁴ McKinnon, K, Walker, S & Davis, D 2000 *Benchmarking: a manual for Australian Universities*, DETYA, Canberra

programs that have an emphasis on applied learning and which work to dissolve the nexus between industry practice and skills and knowledge acquisition.

The 2008 discussion paper *Skilling Australia* released by Deputy Prime Minister Julia Gillard, Treasurer Wayne Swan and Employment Participation Minister Brendon O'Connor confirms the importance of addressing workforce training for these goals:

Targets have been set to halve the proportion of Australians aged 24 to 64 years without qualifications at Certificate Level III and above and double the number of higher qualification completions (diploma and advanced diploma) by 2020.

'Skills and workforce development' is a key element for the 2008 COAG Reform Agenda goals 'to boost productivity, workforce participation and geographic mobility'. A range of programs have been developed to support achievement of these goals many of which focus on building teacher professionalism in the TAFE sector. One such program is the Australian, State and Territory workforce development initiative Reframing the Future program which includes:

- Funding of professional development and change management projects under one or more of seven priority areas – quality, training packages, assessment, employability skills, skills shortages, partnerships, diversity;
- TAFE practitioner forum.

Teacher professionalism in an applied environment represents an important defining criterion for continuing with the distinctive missions of vocational and higher education. Box Hill Institute supports teacher professionalism in an applied environment that takes into account the specialist skills of practitioners in their industry sector. Teacher professionalism is closely tied to TAFE sector quality learning outcomes.

Teacher professionalism is supported at Box Hill Institute through targeted training and formal education. Targeted training is provided in the form of intensive workshops designed to allow staff to explore and articulate differences between teaching at VET and higher education levels, both practically and pedagogically, within an applied education framework.

Box Hill Institute recognises the significance of the changing workplace for VET practitioners and, underpinning the 'new vocationalism', has developed a teaching and learning framework for the professional development of its teachers (Mitchell et al, 2006 and Chappell, 2002).

The Institute also supports the development and operation of its Communities of Practice that focus on industry engagement, industry participation and industry sponsorship.

To address many of the issues that are being identified as significant for vocational education and applied higher education teaching and learning, Box Hill Institute has strategically positioned itself to work in partnership with industry and governments for:

- curriculum reform to create relevant training for emerging sectors, in particular information technology and biotechnology and in the foundation skills necessary for industry-ready graduates such as literacy, numeracy and languages other than English, as well as in generic capabilities.
- greater flexibility of approaches to training methods, in particular the use of new technologies, new materials and services. In traditional sectors a lack of new technologies is fundamentally affecting productivity and competitiveness

- greater support for the concept of 'training workplaces' and for enabling partnerships including those with industry and small businesses
- provision of resources to VET to construct curricula which maintain the industry focus of vocational qualification but which interpret training package learning outcomes for vocational diplomas/advanced diplomas in line with higher education approaches to knowledge construction.

Recommendation 4

Box Hill Institute confirms the need to continue with the distinctive missions of the vocational and higher education sectors as defined by goals for industry awareness and teacher professionalism. Box Hill Institute recommends the restoration of a dual sector model in higher education rather than the single sector model that resulted from the Dawkins reforms.

Box Hill Institute recommends that in order to benchmark nationally and internationally there should be Commonwealth resource funding provided to Institutes for quality indicators including mapping of curriculum; world best practice, quality assurance evaluation.

Recommendation 5

Whilst currently accreditation for applied degrees is largely influenced by universities, Box Hill Institute recommends it is essential that degree offerings are relevant to industry and industry requirements. Experience has shown that this has been proven to be possible without losing academic integrity consequently polytechnics, or if polytechnics are not agreed to then TAFE Institutes, should be given the ability to self accredit industry based bachelor and associate degrees

Question 16. Does the movement between the sectors of students with credit need to be improved? If so, in what ways?

Box Hill Institute believes that urgent systems reforms to the credit transfer process are needed to make it more transparent and at the same time more robust to facilitate the movement of students between sectors. This includes promulgating efficiencies in both time and money for students, institutions, and government.

The Discussion Paper identifies that movement between the sectors by students is relatively small, most probably a result of the many barriers that presently exist for VET students who seek higher education study pathways. For VET students, university admission is not automatic or indeed guaranteed throughout Australia. There is no system wide approach to university admission or credit recognition, thus pathways from VET into higher education occur through local agreements and occur unevenly. Each of the states has implemented individualised credit transfer systems with universities in their states. In New South Wales and Victoria, the combined VET learning effort represents 70% of Australia's national delivery⁵. Both of these states have invested in localised systems to foster articulation and credit transfer arrangements.

For many students who wish to enter higher education following VET study, it is not clear as to how their previous studies contributes to and complements the next stage of study. Systemically there is a lack of clarity between what counts as a credit

⁵ Ministerial Council on Education, Employment and Youth Affairs (MCEETYA) 2005 Good Practice Principles for Credit Transfer and Articulation from VET to Higher Education, Commonwealth Government

transfer or exemption. These problems exist despite a national framework and national approach established to enable credit transfer and sector mobility.

The national framework, the Australian Qualifications Framework (AQF), has the potential to be a credit transfer enabler by providing a cohesive and comprehensive nationally consistent framework for all post-compulsory education and training. However the efficacy of utilising the AQF descriptors for the task of assessing credit remains fraught given the different nature of qualifications across vocational domains and industry contexts, the potential range of unit levels contained within individual qualifications, and the differences in duration for qualifications at the same level.

A national approach to articulation and credit transfer arrangements has been actively pursued by MCEETYA. In 2005 MCEETYA developed good practice principles for credit transfer and articulation from VET to higher education that included the requirement that

All individual institutions and providers should include vertical and lateral pathways for credit and articulation, both in the design of new courses and programs of study and when upgrading existing courses and programs of study, and that these pathways should be widely publicised to existing students and potential applicants⁶.

However, more far reaching reform is needed whereby a national system is developed. A national system would address all requirements for credit transfer and exemption across the post-compulsory education sectors throughout Australia.

Credit Matrix trial in Victoria

In Victoria, the devolved nature of the VET provider system has meant, as for other states, a diffuse and localised approach to credit transfer and articulation arrangements. However, the Victorian Registration and Qualifications Authority has been developing a cohesive policy approach to credit transfer for the state. In 2003 the VRQA initiated projects to model and trial demonstration credit transfer approaches known as the Credit Matrix. In a recent project involving TAFE institutes and universities the credit matrix was found to:

...provide a much-needed common language and Framework for discussing and developing credit transfer between different post secondary sectors⁷.

The VRQA policy agenda has the potential to have national implications.

Recommendation 6

Australia, like many other countries internationally, is working toward increasing and extending opportunities for student mobility. A cohesive national system for credit recognition is yet to be fully realised. Box Hill Institute recommends that a national system for credit transfer is developed. Box Hill Institute further supports the Credit Matrix trial and recommends that it (or similar) be used as the basis for extending student mobility.

⁶ Ministerial Council on Education, Employment and Youth Affairs (MCEETYA) 2005 Good Practice Principles for Credit Transfer and Articulation from VET to Higher Education, Commonwealth Government

⁷ Victorian Registration and Qualifications Authority (2008), 'Credit Matrix Trial Project- Impact of the application of the Credit Matrix in the advanced standing (credit transfer) determination process between Higher Education and TAFE sectors' available at <http://www.vrqa.vic.gov.au>

Recommendation 7

Box Hill Institute recommends that all students studying within TAFE Higher Education Providers have access to Commonwealth Supported Places and Scholarships consideration should be given to providing students with individual entitlements and thus providing them with the choice of higher education provider.

Recommendation 8

The Commonwealth government should provide tagged grants which ensure a guaranteed access to TAFE graduates into university provided they meet the eligibility criteria. A university/TAFE linkage initiative program should be considered as part of a change strategy.

Question 17. What are the effects of current differences on funding, governance and regulation in limiting planning or influencing choice between the sectors?

A number of structural issues currently impede the ability of TAFE Institutes to plan for or respond to the needs of their students to have greater choice and mobility.

Educational structures could better support student choice and mobility if high quality, authenticated learning and responsiveness were assured from all providers of tertiary education irrespective of the funding, governance and regulations under which they function. This would be achieved by:

- creating a structure that recognises the learner's outcomes in terms of knowledge and skills, their style of knowledge and skill acquisition and those gained through life long learning
- establishing a quality assurance and continuous improvement model that is applied to the tertiary education system irrespective of the sector. This would assist higher education and VET institutions to have a point of reference in relation to academic issues and standards
- applying equitable access to student contingency-based loans for learners studying higher education degree programs irrespective of their sector.

Greater choice and mobility for TAFE students would be enabled through the following governance, funding and regulation structures:

- provide greater autonomy to TAFE institutes to support the complexity of their operations, their own planning knowledge, local/industry knowledge and market demand, including the delivering of education and training offshore. Overseas operations and delivery require greater autonomy and flexibility of decision making than currently exists for Institute Boards
- provide more certainty to TAFE Institutes in their funding. In many jurisdictions Institutes are funded on an annual basis. Course planning and development is impeded by such a constraint. Box Hill Institute supports the adoption of a model based on the university funding system of triennial funding, including funding for capital works projects and appropriate recognition of depreciation in funding arrangements
- remove existing constraints to attract and retain high calibre staff. TAFE institutes require greater flexibility to recruit and remunerate quality staff if education and training programs are to remain competitive and to prevent staff attrition.

- reduce the level of reporting to governments at both state and national level to bring about greater efficiencies in reporting, auditing and regulation across sectors
- expand partnerships and collaborations to build more enabling TAFE sector infrastructure such as:
 - allow private investment in TAFE institutions to build infrastructure, to complement scarce public resources
 - allow TAFE Institutes to service the needs of national clients. The recently released report by the Boston Consulting Group 'Skilling Australia's Workforce 2005-2008 Mid Term Review' suggests some enhancements to the national market for vocational education and training. The report highlights the frustration of many employers to find a training provider that can serve the needs in multiple jurisdictions. The report notes that many TAFE Institutes are constrained in their ability to service national clients by state arrangements that restrict access to Government funded training.

Box Hill Institute's experience supports the view of this report that 'indeed we believe that the biggest short term boost to dynamism in the VET sector could come from reducing the barriers that hinder TAFE Colleges from competing in interstate markets'.

Recommendation 9

TAFE institutes are now complex institutions who look to enhance student mobility across a number of jurisdictions and sectors. TAFE institutes will better plan and respond to needs for student mobility through improved governance, funding and regulation structures and policies. It is recommended that the needs for greater autonomy, flexibility and equity in governance, funding and regulation in TAFE institutes be considered for the purpose of enhancing student mobility and choice.

Question 18. Can institutions provide examples of good practices which have led to movement between the sectors with high levels of credit and good learning outcomes?

In 2005 Box Hill Institute and Deakin University entered into a formal Memorandum of Understanding to develop and extend the respective capacity for partnership arrangements that assure quality learning in an increasingly competitive education market. In 2007 the Deakin TAFE Alliance was formed between Box Hill Institute, Deakin University, South West TAFE and the Gordon Institute.

The partners in the Deakin TAFE Alliance have recently completed the Credit Matrix trial project for the Victorian Registration Qualifications Authority⁸. The Credit Matrix, as developed by the VRQA, offers a means to facilitate the transfer and recognition of skills and capabilities achieved through TAFE learning for university study. The object of Credit Matrix trial project was to assess the Credit Matrix in relation to its efficacy in the assessment of credit transfer arrangements. In this project the Business Services Training Package (BSB07) was mapped to the business degrees offered at Deakin University utilizing the Credit Matrix. This project demonstrated that

⁸ Victorian Registration and Qualifications Authority 2007 Credit Matrix Trial Project, Deakin University, Box Hill Institute of TAFE, Gordon Institute of TAFE, South West Institute of TAFE

the Credit Matrix could provide a transparent system for learner movement between the sectors.

This proofing project, acknowledged as an example of good practice, has been well received by stakeholders and the findings have been disseminated in Victoria and presented by Rob Fearnside (Deputy Director VRQA) in Canberra in July 2008.

Resourcing the system

Question 28. What incentives or unintended consequences are there in the current arrangements for higher education funding?

The Discussion Paper identifies many instances of inconsistencies in resourcing the higher education sector. As a non self-accrediting higher education provider under the funding and legislative authority of the state government Box Hill Institute is subject to further inconsistencies and inequities. Further, as noted in the Discussion Paper 'the current system of resource allocation works against certain forms of diversity...because the primary funding streams for teaching and research are allocated on the same basis'.

A consequence for TAFE institutes who offer higher education courses under state government authority is their obligation to meet Commonwealth Government registration and regulatory higher education requirements but without access to associated Commonwealth funding. This results in such inequities as:

- lack of ability to access Commonwealth funds to support mandatory quality reporting requirements, for example course evaluations, graduate destination surveys and outcomes reporting requirements.
- lack of ability to access Commonwealth Supported Places to achieve access and equity for TAFE higher education students.

With a 'level playing field' policy new higher education providers such as TAFE institutes are significantly handicapped in accessing research funding or in applying for applied research funding and grants. Staff qualifications and research history are criteria upon which new delivering institutions are not able to compete.

Irrespective, Box Hill Institute has created the opportunity to participate in applied research through its unique relationship with the US Company PaleoTechnology International Inc and its Australian subsidiary, PaleoTechnology Australia Pty Ltd, which is a company in residence at Box Hill Institute. PaleoTechnology Australia has established a laboratory at the Box Hill Institute Elgar Road campus and is developing standard operating procedures to develop technology-based proprietary equipment installed at Box Hill Institute. The PaleoTechnology/Box Hill Institute laboratory can be used to train students as well as individuals who are already in the industry and who wish to upgrade their skills.

PaleoTechnology Australia has beneficial ownership of the intellectual property that will provide environmentally-friendly propellants and solvents. Box Hill Institute benefits from this relationship in providing a training workplace for students and financial benefits from any of the commercial activities arising from the laboratory activities at Box Hill Institute.

Despite its role as a higher education provider and as a research organisation, Box Hill Institute (along with other similar TAFE institutes) is currently precluded from receiving grants under programs administered by the Australian Research Council (ARC) and AusIndustry as TAFE institutes are not defined as higher education

institutions under the ARC and AusIndustry funding guidelines. AusIndustry administered grants preclude TAFE, together with industry partners, as the lead agents.

This omission limits the capacity of organisations such as Box Hill Institute to apply for ARC Linkage grants, AusIndustry grants and other such grants and limits Box Hill Institute's ability to form partnerships with industry for research and development opportunities in order to access this funding.

Additionally, TAFE institutes are not able to receive monies from the Higher Education Endowment Fund which provides universities with capital expenditure monies for facilities to support teaching, research and student amenities.

TAFE institutes are similarly not eligible to become Cooperative Research Centres which require applications to be from collaborations with:

- at least one Australian higher education institution (or research institute affiliated with a university) among its core participants
- at least one private sector participant among its core participants. In these guidelines, a private sector participant means an entity, other than a higher education institution, the majority of whose revenue is not derived from government.

To be noted, these restrictions contradict Box Hill Institute's status as a Higher Education Institution under the provisions of the HEFA 1988 and as a Higher Education Provider under the provisions of the HESA 2003. With this status Box Hill Institute has been endorsed as a deductible gift recipient under Item No. 2.1.3 ('higher education institution') of Subdivision 30-B of the Income Tax Assessment Act 1997. As a condition of endorsement Box Hill Institute has established and maintains a 'Gift Fund' pursuant to the provisions of Section 30-125 of the Income Tax Assessment Act 1997 and Taxation Ruling TR 2000/12. The objects of the Gift Fund are to exclusively support those activities conducted by Box Hill Institute as a Higher Education Institution under the provisions of the HEFA 1988 and as a Higher Education Provider under the provisions of the HESA 2003 including but not limited to the teaching of higher education awards, research and scholarship. This enables donors to the fund to claim a tax deduction for donations, which are related to research by Box Hill Institute.

Recommendation 10

Box Hill Institute recognises that pure or long-term research is not the province of the TAFE system. However, it recommends that some TAFE institutes be listed as Eligible Organisations for more applied research funding such as CRCs and ARC Linkage grants.

Question 30. Are the current institutional arrangements for determining relative funding between higher education institutions appropriate? If not, what changes should be considered?

The Relative Funding Model for determining funding to higher education teaching according to discipline groups and program levels has no direct applicability to full-fee paying degree programs provided by TAFE institutes such as Box Hill Institute. However a TAFE full fee-paying degree needs to be competitive and the market-place perceives that their cost should not be as high as that for a university equivalent. This puts a strain on delivering a quality educational product with the specialised teaching and delivery requirements of applied degrees. These varying delivery components of a TAFE degree suggest that there is a need for an extension

of the Relative Funding Model to be modelled for applied higher education courses delivered in the VET sector.

Governance and regulation

Question 31. Is it time to reshape tertiary education in Australia and streamline financing and regulatory arrangements?

Box Hill Institute strongly believes that it is time to streamline Australian tertiary education financing and regulatory arrangements. The Institute seeks recognition of the duplication and the regulatory burden on non self-accrediting higher education providers at both State and Commonwealth levels.

Box Hill Institute works within three regulatory arrangements. It is a Registered Training Organisation funded by the Victorian Government delivering national Training Packages. It is accredited as a higher education institution, with every course accredited, by the Victorian Regulation and Quality Authority. It is also registered as a Non Self-Accrediting Higher Education Provider by the Commonwealth Department of Education, Employment and Workplace Relations.

Each of the accreditations of Box Hill Institute's higher education courses lasts for five years at which time they need to be reaccredited. The impact of the timing of these reaccreditations is such that Box Hill Institute will be constantly providing regulatory information as courses reach the end of their accreditation period. In addition re-registration as a Non Self-Accrediting Higher Education Provider in Victoria is due within the next three years whilst Box Hill Institute provides annual quality assurance and improvement information for each of the higher education courses it delivers.

The data required for the three regulatory arrangements is often identical, albeit in a different format. If the information gathered could be simplified by identifying identical data requirements, the administrative workload would be significantly improved.

Box Hill Institute as a TAFE institute has additional rigorous reporting obligations to the State government as well as a detailed and audited annual report. Again, the requirement for ongoing data sourcing of institute statistics that are frequently replicated but to be provided in various forms of presentation and analysis is extremely onerous.

Question 32. Is the level of regulation in the sector appropriate? If not, why not, and what should be done to reduce the level of regulation?

The level of regulation could be reduced by separating institute viability reporting from course quality reporting. Some data which is required at institute level, such as staff qualifications, would be better placed in the data collected for the reaccreditation of courses. Box Hill Institute recommends a revision of the process for its reaccreditation as a higher education provider and for the reaccreditation of the first course accredited.

Another suggestion for reducing the duplication of data management and analysis is to align the quality audit for re-registration as a Non Self-Accrediting Higher Education Provider with the reaccreditation processes. If re-registration and re-accreditation were aligned to a similar time frame it would allow information that is similar across three areas of regulation to be provided more easily and in the same administrative cycle.

Box Hill Institute proposes single points of reporting and provision of information for multiple outcomes and purposes. Accreditation takes a snapshot of the health of the quality system at a point in time and maintaining registration should be based on the capacity of the institution to show continuous improvement. Annual reports could suffice for re-registration purposes due to their function of monitoring the core business of education on an annual basis.

Question 33. Does Australia's Quality Assurance Framework need revision? If so, why? What changes would you make?

Box Hill Institute considers that there is need for a revision of Australia's two post-compulsory education Quality Assurance Frameworks. Whilst the Quality Assurance Framework applies only to universities and is audited by the Commonwealth Government's Australian Universities Quality Agency (AUQA), the Australian Quality Training Framework 2007 (AQTF) ensures the quality of training through outcomes-focussed audits undertaken by state and territory registering bodies with the participation of licensing and industry regulatory bodies. (The Higher Education Regulation Division of the Victorian Registration and Qualifications Authority also conducts quality audits of new higher education providers but with regard to their quality systems that pertain to educational systems only. [Discussed in the response to Question 14, above]. Their quality framework is analogous to AUQA's educational systems framework.)

Box Hill Institute considers that the weaknesses and strengths of both AQF and AQTF 2007 approaches are comparable and that their synergies are demonstrated in the reporting requirements of AUQA and the reporting requirements of AQTF 2007 which is against three essential standards of continuous improvement.

Faced with the challenges of both systems, Box Hill Institute is implementing the ADRI (Approach Deployment Results Improvement) business excellence model used by the Australian Quality Council to establish a continuous improvement cycle for both its higher education and VET programs. The ADRI business excellence model applies equally to the quality assurance systems of AQF and AQTF.

Box Hill Institute believes that the key change required to Australia's Quality Assurance Framework is for a common Australian Quality Assurance Framework to be developed for all sectors and jurisdictions. This more than likely would assist with articulation arrangements between higher education and the VET sector. A common Quality Assurance Framework would be a catalyst for greater mutual understanding and respect. The soundness of the educational practices in all sectors would be openly articulated. Both the higher education sector and the VET sector are more than qualified to respond to a common framework.

Question 34. Are changes required to the Australian Qualifications Framework?

Box Hill Institute believes that changes are required to the Australian Qualifications Framework to better support the purpose and key objectives of the AQF (see website) regarding promoting lifelong learning, promoting a seamless and diverse education system, and helping to develop flexible pathways to assist students move between education and training sectors, including credit transfer.

As mentioned in the response to Question 16 above, in order to strengthen the AQF for the above objectives, further work needs to be undertaken on the AQF descriptors. This task would be undertaken for the purpose of more successfully assessing credit of courses and units across different educational and training

sectors. The outcomes may lead to changes being made to develop a more seamless pathway of educational qualifications and achievement across sectors.

Conclusion and Recommendations

The opportunity to respond to the Discussion Paper of the Review Panel on Australian Higher Education has confirmed many of the conclusions of Box Hill Institute as a provider of higher education within the TAFE system. Namely, that there is an opportunity for Australian Higher Education to develop as a unique system that responds to the need for quality and diverse educational provision. Such a unique system is modelled on principles of maintaining sector distinctiveness but avoiding and resolving sector disenfranchisement.

TAFE institutes have a powerful ability to deliver a vocationally exceptional higher education experience to students and the TAFE system accordingly does not seek a morphing of its exceptional qualities in order to become an imitation mainstream university. However it does seek systems, governance and regulatory parity with other higher education providers so that it can have the requisite autonomy, flexibility and opportunity to build quality education and research expertise for an industry-led education innovation.

The following ten recommendations support these conclusions.

Recommendation 1

Box Hill Institute recommends the adoption of an Australian Polytechnic Model similar to that in other OECD countries. The model would enable industry curriculum development to be sourced from a range of industry sources to focus on individual curriculum needs.

This recommendation could form part of a broader approach of restructuring both the higher education and VET sectors. BHI considers that there is merit in a system which includes:

- A smaller number of research only universities;
- A range of teaching and learning universities ;
- A polytechnic model incorporating a small number of TAFE providers offering a broad range of programs including Bachelor degrees and applied research;
- A system of community colleges meeting local needs;
- Secondary schools which have as an element a specialist stream in areas of particular vocational focus or other areas of speciality.

Recommendation 2

Box Hill Institute recommends those TAFE providers with extensive experience in delivering a full range of qualifications from Certificate level to Bachelor qualifications should be approved as Polytechnics.

Any move to this model should be done on a voluntary basis with the Commonwealth government giving incentives for organisations to make such moves. Eligibility criteria would need to be established for each group.

Recommendation 3

Box Hill Institute believes that applied higher education may be most appropriate to indigenous participants and recommends that national funding be made available to TAFE institutes as primary providers to support such participation.

Recommendation 4

Box Hill Institute confirms the need to continue with the distinctive missions of the vocational and higher education sectors as defined by goals for industry awareness and teacher professionalism. Box Hill Institute recommends the restoration of a dual sector model in higher education rather than the single sector model that resulted from the Dawkins reforms.

Recommendation 5

Whilst currently accreditation for applied degrees is largely influenced by universities, Box Hill Institute recommends it is essential that degree offerings are relevant to industry and industry requirements. Experience has shown that this has been proven to be possible without losing academic integrity consequently polytechnics or if polytechnics are not agreed to then TAFE Institutes should be given the ability to self accredit industry based bachelor and associate degrees

Recommendation 6

Australia, like many other countries internationally, is working toward increasing and extending opportunities for student mobility. A cohesive national system for credit recognition is yet to be fully realised. Box Hill Institute recommends that a national system for credit transfer is developed. Box Hill Institute further supports the Credit Matrix trial and recommends that it (or similar) be used as the basis for extending student mobility.

Recommendation 7

Box Hill Institute recommends that all students studying within TAFE Higher Education Providers have access to Commonwealth Supported Places and Scholarships consideration should be given to providing students with individual entitlements and thus providing them with the choice of higher education provider.

Recommendation 8

The Commonwealth government should provide tagged grants which ensure a guaranteed access to TAFE graduates into university provided they meet the eligibility criteria. A university/TAFE linkage initiative program should be considered as part of a change strategy.

Recommendation 9

TAFE institutes are now complex institutions who look to enhance student mobility across a number of jurisdictions and sectors. TAFE institutes will better plan and respond to needs for student mobility through improved governance, funding and regulation structures and policies. It is recommended that the needs for greater autonomy, flexibility and equity in governance, funding and regulation in TAFE institutes be considered for the purpose of enhancing student mobility and choice.

Recommendation 10

Box Hill Institute recognises that pure or long-term research is not the province of the TAFE system. However, it recommends that TAFE/Polytechnics with a proven track record of applied degree delivery (associate and/or bachelor) are be listed as Eligible Organisations for more applied research funding such as CRCs and ARC Linkage grants.