

COMPETITION POLICY REVIEW

Submission

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for the Australian College of Theology
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I welcome the opportunity to make this submission to the Competition Policy Review.

This submission concerns the federal government's continued restriction of access to the Research Training Scheme (RTS), part of the Commonwealth Grants Scheme, to higher education providers which are not listed on Table A or Table B of the Higher Education Support Act (2003). Access to the RTS is dependent on listing. Non-listed providers delivering doctoral degrees with the approval of the Tertiary Education Quality and Standards Agency (TEQSA) are therefore unable to compete with listed providers (in the main the public universities), almost all of whose doctoral candidates receive full tuition scholarships and, in about 20% of cases, an Australian Postgraduate Award (APA) worth about \$25,000 per annum.

There are three results of this restriction of access:

- (1) Since doctoral candidates enrolled with non-listed providers are unable to access funding, non-listed providers find themselves unable to compete with listed providers in attracting and maintaining candidates. This severely hampers their ability to provide tutors and junior academic staff in their delivery of undergraduate degrees.
- (2) The institutional aspirations of non-listed providers for university status are undermined since an essential (and understandable) criterion of such status is the evidence of a doctoral load that is already substantial at application and likely to trend upwards in the first period of registration as a university.
- (3) Doctoral candidates wishing to undertake their research at non-listed provider may be able to defer their tuition fees to the FEE-HELP scheme, but such a deferral results in an income-contingent loan for which the candidate is liable. This situation is hardly comparable to the experience of candidates enrolling in doctoral degrees at listed providers where, as noted above, tuition scholarships are freely available and candidates compete for APAs. Both categories of candidates may undertake the same research and graduate with doctoral awards that are equivalent in learning outcomes and in the quality of supervision and examination.

This inequitable situation is exacerbated by the following:

- (1) A succession of federal governments is unwilling to add providers to Table A or Table B, a course of action that requires legislative amendment, despite the receipt of several applications based on the university compact. The response of the Gillard government and its departmental advisors to the Australian College of Theology in 2012 was that the Government was in the process of reviewing research priorities and would not be listing any new providers in the HESA. More recent enquiries have been equally disappointing.

(2) Governments seem unwilling to open access to new educational players to the benefits of the RTS fearing that this course of action will dilute the research funding currently flowing to the listed providers, chiefly the large research-intensive universities. The research strengths of non-listed providers are all represented among the listed providers. Students are therefore discriminated against if they choose to enrol in a doctoral degree provided by a non-listed provider.

The continued lack of access by non-listed providers to the RTS undermines the principle of competitive neutrality¹ on the grounds that continued government involvement protects access of listed providers and their candidates and denies it to non-listed providers and their candidates. There is no clear public interest or need to persist in this. The fact that non-listed providers deliver doctoral tuition more efficiently than many listed providers underscores the imperative for the federal government to open the RTS to all providers with a research load.

Accordingly, this submission makes just one proposal.

All non-listed higher education providers delivering a TEQSA-approved doctoral degree and the capacity to satisfy the accountability requirements of participation in the RTS should be given immediate access to the RTS by being listed on Table A or B of the HESA.

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¹ See the 5th key area of focus in the Competition Policy Review Terms of Reference.