



## Higher Education Funding Amendment Bill 2002

Submission to the Senate  
Employment, Workplace Relations and Education  
Legislation Committee

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## 1. INTRODUCTION

Christian Heritage College welcomes the opportunity to make this submission to the Senate Employment, Workplace Relations and Education Legislation Committee's inquiry into provisions of the Higher Education Funding Amendment Bill 2002. The bill proposes to extend eligibility to participate in the Postgraduate Education Loans Scheme to students enrolled in postgraduate coursework programs at Christian Heritage College.

In 2002, Christian Heritage College has 449 students (328.25 EFTSU) enrolled in undergraduate and postgraduate programs in Education, Humanities, Social Sciences, Business and Ministry.

Postgraduate coursework programs are offered in Education, Social Sciences and Ministry:

Education	<ul style="list-style-type: none"> <li>• Graduate Certificate in TESOL (commencing in 2003)</li> <li>• Graduate Diploma in TESOL (commencing in 2003)</li> <li>• Graduate Certificate in Christian Education</li> <li>• Graduate Diploma in Christian Education</li> <li>• Master of Education</li> </ul>
Social Sciences	<ul style="list-style-type: none"> <li>• Graduate Certificate in Human Behaviour</li> <li>• Graduate Certificate in Marriage &amp; Family Counselling</li> <li>• Graduate Diploma in Human Studies</li> <li>• Graduate Diploma in Counselling Studies</li> <li>• Master of Counselling (commencing in 2003)</li> </ul>
Ministry	<ul style="list-style-type: none"> <li>• Graduate Certificate in Ministry Studies</li> <li>• Graduate Diploma in Ministry Studies</li> </ul>

The current proposal to extend PELS eligibility to CHC students has its origins in a commitment made by the former Minister, Hon Dr David Kemp, in October 2001 to include the College within the provisions of the *Higher Education Funding Act*. According to Dr Kemp, that commitment was intended to recognise the role of the College in preparing teachers for Christian schools, and to assist "to provide a potentially sounder and more equitable base to assure the supply of suitably qualified teachers in private schools with a religious mission". It is therefore appropriate at the outset to make reference to CHC's contribution to Australian higher education as a provider of teacher education programs.

Christian Heritage College's original mission lay in teacher education. The College has offered fully accredited initial teacher education programs since its establishment in 1986, and presently has an enrolment of approximately 150 EFTSU in early childhood, primary, and secondary Bachelor of Education programs. These programs are presently available only on a full-fee basis, a situation which denies many eligible students access to them. While the College has pursued a specific mission in the preparation of teachers for the Christian schools sector, graduates readily find employment in both government and non-government schools around Australia.

Since its first Graduation Ceremony in 1990, Christian Heritage College has produced 512 graduates from diploma and bachelor degree programs in teacher education:

<b>One-year programs</b> • Bachelor of Education (Inservice)	158
<b>Two-year programs</b> • Bachelor of Education (Secondary) (Graduate Entry)	4
<b>Three-year programs</b> • Diploma of Teaching • Bachelor of Teaching	166
<b>Four-year programs</b> • Bachelor of Education - Primary/Early Childhood, Primary, Secondary Bachelor of Arts/Bachelor of Education	184
<b>Total</b>	512

Estimating the nett cost to the Commonwealth of training these teachers in the public sector at a conservative \$6,000 per EFTSU per annum, these graduates represent a saving to the Commonwealth of at least \$8.4 million over the past decade.

## 2. THE CASE FOR PUBLIC SUBSIDY OF TEACHER EDUCATION IN THE PRIVATE HIGHER EDUCATION SECTOR

Christian Heritage College has contended for more than a decade that there is a compelling case for public support for teacher education programs offered in private higher education institutions. These arguments are outlined briefly below.

- Research indicates that the quality of teaching is the major determinant of the quality of students' learning. The Minister for Education, Science and Training, Hon Dr Brendan Nelson, has declared that quality teaching is a national priority. Consequently the quality of teacher education is also a matter of national concern, as the Minister's recently announced review of teaching and teacher education indicates.
- Successive Governments have accepted the importance of the provision, for non-government schools, of teachers who are conversant with the particular ethos of groups of schools in the non-government sector, and there are significant precedents for the public funding of teacher education programs serving the non-government sector. In 1973, funding was provided to the former Catholic teachers' colleges and to Avondale College, which serves the Seventh-Day Adventist schools. More recently, funding for teacher education was granted to Notre Dame University, in recognition of its role in preparing teachers for Catholic schools in Western Australia. It is both inequitable and discriminatory that similar funding is presently not provided for the

same purpose in relation to the fastest growing sector of Australian schooling, namely the Christian schools sector, which is the sector particularly served by Christian Heritage College.

- The Minister's 2002 budget statements have highlighted projections of continuing growth in non-government school enrolments. In addition, census data confirms that overall population growth is strong in Queensland and New South Wales, which are the states particularly served by Christian Heritage College. Christian schools in Queensland continue to experience enrolment growth rates of around 7-8% per annum, creating a need for more than one hundred additional teachers each year in Queensland alone. CHC graduates presently fill less than half of these positions, and an urgent expansion of the College's preservice teacher education programs is needed to address the employment needs of Christian schools.
- This need for new graduates is exacerbated by the strong national and international demand for teachers which the *Crossroads* discussion paper has recognised. It would therefore be not only unfair, but also short-sighted, to keep in place the obstacles which presently discourage many suitably qualified candidates from preparing themselves to teach in Christian schools.
- There is a continuing need for expansion of higher education places in Queensland. Demographic projections indicate that 58% of the national growth over the next ten years in the 15-24 years age cohort will be in Queensland, creating an ongoing need for new places simply to maintain current participation rates. Moreover this growth will be concentrated in south-east Queensland, which is Christian Heritage College's primary catchment area.
- All higher education produces both public and private benefits. However it has long been recognised that, in the case of teacher education, the public benefits generated by a quality program outweigh the private benefits accruing to the individual. Previous decisions in relation to the catholic teachers' colleges, Avondale College and Notre Dame University demonstrate the Commonwealth Government's recognition that the public benefit of teacher education for the non-government schools sector justifies its support by public subsidy.

Moreover, paying full tuition fees up-front is not expected of any Australian preservice teacher education student in any public university in this country. That teaching is a special case in relation to public support is indicated by the *Higher Education: Report for the 2002 to 2004 Triennium*, which notes that "courses leading to an initial qualification in nursing or teaching . . . must be offered on a HECS-liable basis" (p. 84). It is markedly anomalous that a course of study which must only be offered on a HECS-liable basis in the public sector can at present only be offered on a full-fee basis in an institution such as Christian Heritage College which is a long-established and well-credentialed provider of teacher education.

In summary, it is both unfair and illogical that successive Commonwealth Governments, which have annually poured hundreds of millions of dollars into teacher education, should then be content to rely entirely upon private contribution, with all the limitations upon access that this involves, to fund initial teacher education and continuing professional development for the fastest growing sector of Australian schooling.

Christian Heritage College therefore warmly welcomed the recognition of the former Minister, Dr Kemp, in October 2001 of the contribution of private providers of teacher education, and welcomed his commitment to include the College in the *Higher Education Funding Act*. The College consequently welcomes and endorses the Higher Education Funding Amendment Bill 2002 as a fulfilment of those election commitments.

### **3. THE CONSEQUENCES OF LIMITING THE POSTGRADUATE EDUCATION LOANS SCHEME TO THE PUBLIC SECTOR**

The introduction of the Postgraduate Education Loans Scheme (PELS) is an important and welcome innovation in Australian higher education, and its extension to a number of private providers, as proposed in the present bill, is a particularly welcome development.

Discussion of the merits of PELS and its extension to the private sector should begin with the recognition that PELS is a benefit to the student. However PELS does have the potential to affect institutions when eligibility for the benefit is applied on a discriminatory basis between institutions.

Christian Heritage College contends that all students undertaking accredited postgraduate coursework programs should have access to the PELS scheme, irrespective of whether they choose to study in a public or a private higher education institution. Given that the stated rationale for PELS is to remove barriers to national investment in education, training and skills development, and to assist students to upgrade or acquire new skills, there is no inherent reason why the scheme should have been limited to students enrolling in public universities. A postgraduate coursework award from a private university or college should not be considered to be in any way less effective in contributing to these worthy national and individual goals. Moreover postgraduate students should be regarded as competent to choose the course and institution which will best equip them with the new skills they seek to acquire, rather than as needing to be steered in a particular direction by financial incentives.

Indeed eligibility to participate in deferred-fee arrangements should be extended to full-fee-paying undergraduate students as well, since the same arguments apply with equal force to undergraduate studies.

Prior to the introduction of PELS, full-fee postgraduate coursework programs had been an area where private higher education institutions were competing with publicly funded institutions on something approaching an equal footing, and private institutions had become significant providers of such programs. Data from the 1999 survey of enrolments in private higher education indicate that private institutions accounted for 9.7% of all postgraduate enrolments in Australia whereas, due to the effects of the discriminatory undergraduate HECS and funding arrangements, the private sector accounted for only 1.9% of total undergraduate enrolments.

Moreover private institutions were much more vulnerable to changes in postgraduate study patterns since postgraduate enrolments comprised a much greater percentage of their total enrolment (47%) than was the case in public universities (16%).

Thus this worthy innovation had the unintended consequence of imposing afresh upon one group of providers a massive market disadvantage in the form of exclusion from PELS arrangements. Intending students simply do not have a free and equal choice when one institution must of necessity charge tuition fees up-front, while another offers the full deferral of fees.

The enrolment data cited above provide compelling grounds to widen eligibility criteria for the Postgraduate Education Loans Scheme. Given initial indications that PELS has been highly successful in encouraging postgraduate enrolments in public universities, then PELS in its present form must result in some drift away from private higher education institutions, threatening the viability of some postgraduate coursework programs. In Christian Heritage College's case, the outcome in 2002 was deferral of the introduction of some planned programs, and a drop in postgraduate enrolments of 24% in spite of a wider range of courses being available than in the preceding year.

Such difficulties can only be resolved by an extension, in the name of fairness, of PELS eligibility to all full-fee-paying students in the private sector.

Moreover, there is no reason to regard competition between public and private sectors as undesirable. If offered on an equal footing, programs will succeed or otherwise on the basis of their public reputation, the relevance of the course to students' needs, and the quality of students' experiences in the course. Competition is not a bad thing; it simply means choice for the student from a range of options, and this must help to refine the responsiveness of postgraduate coursework programs to students' needs.

#### **4. THE EFFECT OF CREATING A NEW LIST OF UNFUNDED INSTITUTIONS**

The proposed new Subsection 98AA of the present bill inserts a table specifying four higher education institutions as "eligible unfunded institutions". The effect of this provision is to extend eligibility for PELS to students enrolled in accredited postgraduate coursework programs at the four institutions so specified.

Christian Heritage College supports the extension of PELS eligibility to all students in accredited postgraduate coursework programs offered by private higher education providers. The form of the present proposal, in creating a new list of unfunded institutions, will facilitate the future extension of PELS eligibility to other accredited private higher education institutions, and this is to be welcomed and commended. Given the strictly limited nature of the benefits conferred by the bill, future amendments to widen the circle of eligibility must be simpler to achieve than would be the inclusion of a large number of additional institutions in Tables A or B of Section 4(1) of the HEFA Act.

Similarly, the form of the bill would also appear to facilitate the inclusion of private institutions in any further extension of PELS-type loan arrangements to full-fee-paying undergraduates, and this too is to be commended.

Moreover the additional provisions for the supply of census data, for reporting on institutional governance and finances, and for removal from the list by ministerial declaration should ensure that any problems which might arise in participating institutions can be addressed expeditiously, and thus the bill's provisions provide a robust and workable set of arrangements.

The creation of a new category of eligible unfunded institutions also represents a further formal recognition by the Commonwealth of the contribution to Australian higher education of private providers, and this recognition is to be welcomed.

More importantly, the creation of this new category is a recognition of the capacity of students to choose their course of study appropriately, and is also a recognition of the rights of students to have that choice supported fairly by Commonwealth student assistance arrangements.

## **5. ACCESS IN PRIVATE HIGHER EDUCATION**

The most serious form of discrimination in access to private higher education is the discrimination against those who are not in a position to pay full tuition fees on an up-front basis. Elected representatives who are concerned about discrimination are in a position to do something about this form of discrimination, by supporting the extension of PELS-type arrangements to all postgraduate and undergraduate full-fee students, together with HECS-liable places in fields such as teaching and nursing.

Current funding arrangements impose restrictions upon the range of choice open to students of limited means which do not apply to the better off. In effect, virtually the entire private higher education sector has been out of the reach of students who are unable to pay up-front fees.

Moreover, despite the heroic efforts of many students, and the sacrifices of their families, in seeking to obtain an education of their choosing, the impost of up-front fees results in a regrettable diminution of the social diversity of the student body in any private provider. The social benefits of income-contingent loan arrangements as compared with up-front fees has been once again persuasively argued by Professor Bruce Chapman in his submission to the *Crossroads* review.

Christian Heritage College has no desire or intention to become an elite institution. The College seeks to be readily accessible to students from diverse social and economic backgrounds. Yet the absence of a deferred-fee option inevitably excludes many people, both school-leavers and mature students, who want desperately to access the College's courses.



## 6. APPLICATION OF SELECTION CRITERIA IN CHRISTIAN HIGHER EDUCATION INSTITUTIONS

### (a) A framework for discussion

There appears to have been little public discussion about the application of selection criteria in enrolment practices in private higher education. No unambiguous legal framework is evident. However principles outlined by the Human Rights and Equal Opportunity Commission in its discussion paper “*The Human Rights and Equal Opportunity Commission Act 1986 (Cwth): its application to religious freedom and the right to non-discrimination in employment*” might be taken as a starting point for discussion.

The HREOC paper makes the point that “not all distinctions, exclusions and preferences are discriminatory” (p. 7). This comment illustrates one of the difficulties attached to rational discussion of this issue, namely that the term “discrimination” in its common usage has come to have an inherently pejorative connotation, and there are difficulties in finding alternative terms which might refer to distinctions, exclusions or preferences without passing judgement on them. The following discussion will adopt the term “differentiation” to refer to distinctions, exclusions or preferences in a non-pejorative way. It might be noted that distinction, exclusion and preference involve different forms of differentiation, and thus there are still difficulties in using a single term to refer to processes which might be applied in quite different ways with different justifications in various sets of circumstances.

The HREOC paper identifies two principles which can be held to justify distinctions, exclusions or preferences in relation to employment: firstly where such differentiation is based upon the inherent requirements of the job; and secondly, where a religious institution makes a distinction, exclusion or preference in good faith in order to avoid injury to the religious susceptibilities of adherents of that creed. The relevance of these principles to the CHC context is considered below.

### (b) The reality of differentiation in higher education entry

Discussion of public support for allegedly discriminatory selection criteria in private institutions should also begin with a commonsense recognition of the fact that virtually all entry into higher education involves the differential application of certain selection criteria. Programs of all kinds differentiate in favour of the able over the less able. Other more specific forms of differentiation are also applied. Engineering programs favour people with mathematical competence. Visual and performing arts programs give preferential treatment to people with talent and skill in the disciplines concerned. Consideration has been given in the past to how medical programs might favour the socially adept over the anti-social. Teacher education programs seek to exclude people with certain kinds of criminal convictions.

These are not facetious comments, but rather an application of commonsense principles. The issue is not one of whether or not differentiation occurs in selection procedures, since selection always involves application of some specified criteria. The point is rather one of whether that form of differentiation is warranted or not according to its relevance to (i) the nature of the particular course and (ii) its intended outcomes.

**(c) The application of selection criteria at Christian Heritage College**

Entry procedures at Christian Heritage College normally involve a process of informed self-selection, whereby the College seeks to assist potential applicants to come to a decision as to whether CHC is the appropriate institution in which to undertake their studies.

In its Business and Social Science programs, and in its postgraduate Education programs, the College might give preference, all other factors being equal, to applicants who provide evidence of their Christian convictions, but the College does not exclude from consideration applicants who do not provide such evidence.

In relation to undergraduate teacher education programs and to ministry programs, the College considers that this process of informed self-selection is generally effective in informing potential applicants about the institution and its courses, and assisting in decision-making. However the College would assert both a right and a responsibility to differentiate more actively; that is, not to accept an applicant on religious grounds in certain circumstances. Since the case of teacher education is perhaps the more contentious, the following discussion will focus upon specific issues which arise in relation to teacher education.

In only a small handful of cases in the past fifteen years has the College considered the possibility of refusing an application on the grounds of the applicant's religious commitment or lack of it. Nevertheless, since the issue of allegedly discriminatory selection criteria has been raised in relation to the present bill, the College considers it important to outline a justification for the application of criteria which might differentiate between applicants on religious grounds. Christian Heritage College would contend that its potential differentiation between applicants on religious grounds is consistent with the principles outlined in (a) and (b) above. That is, where differentiating criteria might be applied, they are both consistent with the HREOC principles and with commonsense arguments concerning the nature of the course and its intended outcomes.

Christian Heritage College's initial teacher education programs have as their primary goal the preparation of teachers for Christian schools. Indeed the extension of PELS to CHC is motivated by a recognition of the important role played by the College in serving Christian schools. Due to the orientation of these initial teacher education courses towards preparation for the Christian schools sector, and the heavy cost of practicum supervision in the public sector in the absence of public subsidy, students in CHC's programs undertake their major second- and third-year practicum experiences entirely within Christian schools. (CHC students can and do undertake their first-year initial in-school experiences and their final year internship in public school settings, as payment for supervision does not apply to these experiences.)

In relation to schooling, the HREOC discussion paper explicitly recognises "the liberty of parents . . . to ensure the religious and moral education of their children in conformity with their own convictions" (p. 3). Christian parents often choose Christian schools out of a deep conviction that their children's teachers, who stand *in loco parentis*, should share a similar religious orientation and commitment. The HREOC paper also protects "the religious community's joint or shared expression of its beliefs" equally with the individual's. It declares as non-discriminatory any differentiation in relation to employment in a religious institution made in good faith in order to avoid injury to the religious susceptibilities of adherents.

A requirement of Christian commitment for employment in a Christian school clearly meets the “religious susceptibilities” test, and HREOC thus affirms the right of Christian schools, in selecting staff, to take into account an applicant’s religious belief and practice.

In CHC’s experience, Christian schools, which practice such a differentiation in the employment of staff, generally expect, not unreasonably, that a student teacher undertaking a practicum in the school will share the school’s Christian commitments in a similar way. In terms of the HREOC principles, this expectation has both a negative and a positive aspect. That is, not only are the school’s expectations intended to avoid injury to adherents’ religious sensibilities, but students are also expected, as an “inherent requirement of the job”, to incorporate the school community’s ethos, values and religious perspectives in their teaching and their relationships with children. The College has encountered circumstances in the past where a student teacher’s lack of respect and understanding of the particular school’s ethos and values, and their inability to work within that frame of reference, has caused injury to the religious susceptibilities of pupils, parents and their associated church communities.

In CHC’s experience, Christian schools are unwilling to accept into their classrooms student teachers who do not share their Christian commitments, and placement of such a student in a Christian school usually has the potential to jeopardise the future availability of practicum places in the school concerned. Consequently, given its current practicum arrangements, Christian Heritage College recognises that if it cannot arrange a practicum place in a Christian school for a particular student, then that student is effectively unable to complete the CHC course. It would be quite irresponsible for the College, given the secular alternatives readily available to students, to accept a student into a course when that student could not participate in all the required activities of the course and thus complete the course requirements. In this sense, differentiation in selection criteria is justified by the nature of the course and its inherent requirements. It should be noted again in relation to the “inherent requirements” principle, that the College does not differentiate, in the sense of excluding of an applicant from entry, in its Social Sciences and Business programs or its postgraduate Education programs, and does not contend that Christian commitment constitutes an inherent requirement of these courses.

Moreover, in giving consideration to the intended outcomes of a course of study as discussed in (b) above, it has already been noted that criteria for employment in Christian schools usually regard personal Christian commitment as an inherent requirement of the job. It is not unreasonable that a course which has the stated intention of preparing teachers for Christian schools should have a particular interest in recruiting and selecting students who share the faith and values of the schools which it seeks to serve, and who thus fulfil inherent requirements of their likely future employment.

Nevertheless for many years a significant percentage of CHC graduates, for various reasons, have sought and found employment in public schools, and the College takes seriously its responsibility to prepare students for employment in a range of school settings. Indeed the process in Queensland for approval of a course for teacher registration purposes requires demonstration that the course will prepare students adequately for employment in any school in the state, and CHC programs have consistently satisfied this criterion. CHC would like to offer students the option of undertaking their second- and third-year practicum units in a public school setting, but the costs of doing so at present are prohibitive. If the College were

to be successful in obtaining public support for its teacher education programs, making available a wider range of practicum opportunities would be accorded high priority.

**(d) Institutional character**

A further important issue is that of maintaining institutional character. Christian Heritage College is not a secular institution, and deliberately so. Queensland has several excellent public universities offering secular educational programs. If CHC were simply to offer an educational experience identical to that of its secular counterparts, it would have no reason to exist. That is, its *raison d'être* is to be different, to have a special character, and not to be an imitation of a secular institution. Indeed, students choose CHC for its Christian ethos and the integration of Christian perspectives in its study programs.

Higher education institutions with a religious base continually face complex and powerful secularising pressures. The strength of these pressures in the US context has been powerfully demonstrated by James Burtchaell, in his 1998 study *The Dying of the Light: The disengagement of colleges and universities from their Christian churches*, which documented the gradual secularisation of several leading American Christian colleges and universities. It is therefore vitally important for a Christian higher education institution to work to maintain its distinctive Christian character, and concern with the composition of the student body will often be part of such efforts. While these efforts will principally involve focused recruitment strategies and processes of informed self-selection, which are important to help applicants appreciate the mission and character of the institution, they may also occasionally involve the application of differential selection criteria.

Not all religious institutions choose this course of action, but those that find it appropriate in their particular circumstances should not be condemned for doing so. To regard differential entry criteria as in some way unacceptable would be to severely restrict the efforts of an institution to resist secularisation and to maintain its character, and indeed would undermine the very qualities which attract students to it.

Moreover CHC would contend that the Commonwealth should not concern itself with the religious character of an institution and the means by which that is sustained. Public support for students in private higher education should recognise, not the specific religious character of an institution, but rather the outcomes and social function of its courses. Thus, while CHC courses are not identical to those offered by secular institutions, they are comparable, in the sense of leading to comparable employment outcomes. To discriminate between courses or institutions on the grounds of the inclusion of certain religious perspectives and values would be to discourage diversity in Australian higher education at a point in time when there is widespread agreement that greater diversity is to be encouraged.

**(e) Procedural fairness**

Christian Heritage College contends that the application of differential selection criteria, as with all aspects of entry procedures, should be marked by procedural fairness.

Procedural fairness requires that selection criteria are declared and made explicit.

In the CHC context, procedural fairness also means that, while students are asked to provide certain details of their religious background, an applicant who does not do so is not excluded from further consideration in the enrolment process. Processing of an application continues in the absence of this information.

## **7. ACCOUNTABILITY MECHANISMS IN PRIVATE HIGHER EDUCATION**

Christian Heritage College courses are subject to both internal and external accountability mechanisms.

### **(a) Internal accountability mechanisms**

Christian Heritage College has implemented an internal quality assurance framework which is modelled on that of a nearby public university. Within each School of the College, academic programs are overseen by a Board of Studies which functions on a collegial basis. The College's quality assurance model is administered by its Academic Board, and involves regular reporting on academic programs to School and Course Advisory Committees with mixed internal and external representation, including academic, professional and employer representatives. These reporting processes are designed to reflect upon information about course quality from a range of sources, including students' unit evaluations and internal and external moderation of assessment.

Advisory Committees in turn provide advice to the Academic Board and to the College Council. The quality assurance process operates on a five-yearly cycle and culminates with the commissioning of an external panel to conduct a review of a School and its academic programs.

### **(b) External accountability mechanisms**

In the Queensland context, the Minister for Education is the accrediting authority for courses offered by non-university private providers. Accreditation procedures are administered by the Queensland Office of Higher Education (QOHE). The report of the Australian Universities Quality Agency on its trial audit of the QOHE in 2001 commended many aspects of the QOHE's processes. The audit confirmed that accreditation procedures were rigorously applied and thus the Queensland procedures provide a more than adequate assurance that appropriate standards are being upheld in the state's private higher education providers.

Christian Heritage College had its first experiences of state accreditation under the old advanced education system, and has been engaged in course accreditation processes on more than twenty occasions over the past seventeen years. The College contends that state accreditation procedures, when conducted in accordance with the MCEETYA "National Protocols for Higher Education Approval Processes", provide a satisfactory level of assurance of the quality of a course and its delivery arrangements.

Hence it is entirely appropriate for the Commonwealth, for the purposes of PELS eligibility, to rely upon state accreditation as the process of formal recognition and acceptance of courses offered by private higher education institutions.

### **(c) Professional registration or membership**

The processes of professional registration bodies provide further assurance of the quality of courses offered by private higher education providers. Christian Heritage College's initial teacher education programs are approved by the Queensland Board of Teacher Registration as satisfying the requirements for teacher registration in Queensland. The College's courses

satisfy the requirements of registration authorities and public and private employers in other states also.

Counselling programs offered by the College's School of Social Sciences satisfy the academic requirements for professional recognition of the Psychotherapy and Counselling Federation of Australia (PACFA), the Queensland Counsellors Association, and the Christian Counsellors Association of Queensland.

**(d) Inter-institutional links**

Links with academics in other institutions provide a further set of relationships which contribute to internal and external confidence in the quality of academic programs. As noted above, School and Course Advisory Committees include external academic, professional and employer representatives.

Other academic and professional bodies also provide valuable links with the wider academic community. Taking the field of teacher education as an example, the College is represented on the Board of Teacher Registration's Professional Education Committee, and College staff participate extensively in sub-committees of the BTR. The College also contributes significantly to the work of Queensland Council of Deans of Education, and currently provides the Secretary of the QCDE.

As is typically the case in private higher education institutions, CHC faculty also have developed extensive personal links with academics working in the public sector, arising from diverse academic activities such as conference attendance, seminars and colloquia, academic committees, doctoral studies, research collaboration, research supervision and so on.

The College also maintains links with non-government and government employers through its relationships with Christian Schools Australia, the Association of Independent Schools of Queensland, and Education Queensland.

**(e) Employment outcomes**

Perhaps one of the most effective measures of ongoing accountability is the employment outcomes of a course, which provide a "real-world" test of the standard and relevance of a course.

In this respect, Christian Heritage College finds it disappointing that the Graduate Careers Council of Australia has been quite unhelpful to private institutions seeking to participate in nationally comparable studies of graduate destinations and course experiences.

Nevertheless the College has maintained its own tracking of graduates' course experiences and employment outcomes which, together with feedback from employers, continue to provide highly positive assurances of the quality of the College's courses.

**(f) The robustness of academic processes**

As a consequence of the range of quality and accountability measures outlined above, Christian Heritage College would take issue with any automatic assumption that institutions which are not heavily involved in research are necessarily deficient in the robustness of their academic processes. There is no necessary nexus between research activity as it is commonly understood and standards setting. Ernest Boyer, in his *Scholarship Reconsidered: Priorities of the Professoriate* (1990) pointed to the varieties of scholarship which should be recognised

in the typical activities of higher education, and it would be erroneous to think that just one of those forms of scholarship was particularly privileged in informing processes of academic judgement.

Christian Heritage College is primarily focused on teaching as a consequence both of its mission and of its reliance upon tuition fee income to finance institutional activity. Nevertheless the College recognises the importance of research activity in a higher education institution. The College's Research Committee, which is a sub-committee of the Academic Board, has been extensively involved in crafting a highly focused research strategy which is expected to lead in time to significant research outcomes within the constraints of the College's resources.

## **8. CONCLUSION**

Christian Heritage College would argue for a wider recognition of the contribution of private higher education institutions and specifically of Christian higher education institutions to higher education in Australia. Institutions like Christian Heritage College offer courses which are comparable to those of public institutions, yet serve needs which public institutions by definition cannot address.

In a system which is overwhelmingly public and secular, Christian institutions contribute the values and perspectives of traditions which continue to be an important part of Australia's heritage. As diversity is a sign of a healthy ecosystem, so too should it be a sign of a healthy education system.

The Postgraduate Education Loans Scheme provides a benefit to the student, not a public subsidy to the institution. Given that PELS is intended to remove barriers to investment in education and to assist students to upgrade or acquire new skills, students are in the best position to decide which course is most likely to address their individual needs. The objectives of the PELS program are not served by maintaining old barriers or erecting new ones. There is therefore no reason, in the PELS arrangements, to treat properly accredited courses offered by private institutions in a different manner from courses offered in the public sector.

Christian Heritage College therefore welcomes the Higher Education Funding Amendment Bill 2002, and supports its passage through the Parliament.