

Response to "Learning for Life: A review of higher education financing and policy - a policy discussion paper"

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The Melbourne College of Divinity (MCD) applauds the Committee for its vision for Australian higher education and, in particular, its suggestions for the ways in which a partnership between publicly and privately funded institutions of higher education might be developed. As theological education appears to be the largest sector of privately funded higher education, and the Melbourne College of Divinity the oldest and most widely representative theological degree granting institution in the sector, it is hoped that the following comments will assist the Committee, and the Commonwealth Government, in achieving the aims set out in the discussion paper.

The College wishes to make its major response on the issue of public funding being provided to so-called private providers, and also to comment on the issues of accreditation, taxation incentives and Australian Postgraduate Awards.

1. The report says (p21) "The principle that public funding should be provided to non-Government education providers in the schools and VET sectors has been readily accepted by the Australian community. From the students' point of view, there are great inequities in arrangements which provide funding for study in one institution rather than another based on whether or not an institution is defined as 'public' or 'private'. The 'public' benefits flowing from privately provided higher education are arguably as great as those flowing from public education.

Restricting public funding to a certain set of 'public' institutions represents one of the greatest impediments to the development of a private higher education sector in Australia. The highly subsidised nature of education at public universities makes it difficult for private institutions to compete for students in terms of price. Australia stands to benefit from the diversity which would be offered from a wider range of providers."

## A. A PROPOSAL FOR CONDITIONS FOR FUNDING THEOLOGICAL INSTITUTIONS

Funds should be granted to an institution only when at least 250 EFTSUs are enrolled in tertiary award courses and when the following exist

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### i) The institution is

a) established under legislation of the Commonwealth or a State Government or accredited by legislation or other governmental means to confer degrees and

b) linked to at least one University in the unified national system by affiliation or other ways acceptable to DEETYA and

c) sufficiently provided with suitably qualified staff with postgraduate research degrees in the field in which they are teaching and has adequate library resources.

d) The institution is able to prove that progress in the course of studies is unrelated to the confessional aspects of religious studies and that entry to the course is non-restrictive - ie open to all qualified applicants, and with no religious test applied.

ii. A method of accountability and auditing is established by DEETYA after consultation with the institutions concerned in order to monitor such funding (not to be confused with degree accreditation or course approval procedures).

iii. Such funding will be set at the level of enrolments in e.g. 1997 and no increase in this number be permitted except by negotiation with DEETYA.

iv. Such funding, its levels and enrolment projections will be

reviewed every three years by DEETYA in consultation with the institutions involved.

## B. A PROPOSAL FOR PARTNERSHIP

The MCD proposes a model for partnership whereby the Commonwealth

provides funding at the level of 65% of the EFTSUs of an Arts-type study for the purposes of administration procedures, staff salaries, student support structures (including libraries) and examination requirements, so that adequate development and evaluation of the degrees can be conducted regularly. The provision of a grant for such purposes will ensure that the academic standards, monitoring and development of degree programmes is effectively carried out while not infringing on the links between individual theological colleges and their church communities. It will also keep the Commonwealth separate from any confessional/contextual issues in the teaching of theology while ensuring that the degrees are independently monitored and maintained. The institutions will be permitted to continue to charge fees for tuition taking into account the level of government support provided.

The globalisation of the discipline of theology, which is of course not new but of increasing significance as the 'tyranny of distance' is removed, means that theological institutions can no longer simply pay teaching staff salaries based on clergy stipends if they are to attract overseas scholars to Australia. Salaries must be lifted to university levels to allow for the healthy infusion of overseas faculty members to Australian theological institutions. A partnership between the 'public' and 'private' sectors is required to achieve this. Such partnership arrangements already exist in various forms in the United Kingdom, most of Western Europe and Scandinavia, USA, Canada and New Zealand. Australian theological institutions are increasingly disadvantaged by the lack of such a partnership here.

The study of theology is part of an 800 year old tradition within higher education. Not only does it have a professional focus which is vital in education and community services, but it must also be seen as a way of deepening knowledge and understanding within the Australian community. It

provides an integrating vision, models for reconciliation and unity, and helps develop critical and analytical minds. In these ways it makes a contribution to the public good similar to other disciplines in higher education. The College already has Jewish academics teaching in the Bachelor of Theology programme and is open to further such co-operation from other religious communities.

The marginalisation of the study of theology by a refusal to allocate even proportionate federal funding to the MCD (the only self-regulating state-established theological institution in Australia listed by the Australian Qualifications Advisory Board) is detrimental to Australian society and should be redressed. The MCD has signified its willingness to be part of the Unified National System but has been told that no funding would be available to a host university to absorb the 900 EFTSUs required. This is in spite of the fact that some universities have received funding which allows them to absorb much smaller and less academically oriented theological institutions with a much smaller research base. Murdoch, Charles Sturt, Flinders and Griffiths Universities have received such funding. The size and success of the MCD have counted against it in negotiations to achieve a similar partnership with a university in metropolitan Melbourne.

The government has a role to play here to ensure equality of opportunity so that in this part of the higher education sector the best, and not just the lesser and smaller, are able to contribute to Australia's society and culture.

While it appears that the government has already decided against the provision of vouchers for a student-centred higher education funding programme it may be possible to refine the proposal to apply it only to privately funded higher education institutions. If this became possible a scenario could be developed to ensure that only those students who had qualified for normal higher education by having completed the equivalent of year 12 would be eligible for vouchers and a limit of say 20% might be given conditional entry but no HECS or voucher would be available until they had satisfactorily completed the equivalent of one year of tertiary study.

It does appear, from newspaper reports, that the Commonwealth Government will accept neither an extension of HECS or the establishment of a student-centred voucher system and if this is the case the MCD is concerned that it is left in exactly the same position as it was before the committee commenced its deliberations.

The Melbourne College of Divinity emphasises its eagerness to engage in negotiations and discussions to find a way forward for the largest sector of privately funded higher education.

2 Another issue relevant to theological education is discussed on pp32f under the heading Accreditation, quality assurance and accountability. Arguing that any accreditation process [must] be conducted independently both of government and providers and include the financial viability of institutions in order to protect the interests of students and the community together with the provision of comprehensive, high quality and accurate information in order for students to make the best possible choices concerning their education the discussion paper proposes the establishment of an accrediting body independent of all providers.

The argument that even self-regulating institutions such as the universities and the MCD should be accredited by an independent body such as the Council on National Academic Awards (UK) or the New Zealand Qualifications Authority is resisted by the College. The Parliamentary authority given to such institutions and their proven record in research and teaching together with the quality controls, reporting mechanisms and audits already in place, plus the need for independence and diversity means that to bring them under the umbrella of another authority will inevitably weaken those institutions and provide a uniformity and probably a mediocrity in higher education.

However the case for a national accrediting body for other institutions can be made very strongly. The variation in standards currently applied by the different States and the diminishment of State education accrediting bodies, strengthens the case for a national accrediting body applying uniform standards. The whole Australian higher

education sector is weakened by the current practice of accrediting small independent institutions to award Bachelors' degrees which are demonstrably inferior to those awarded by Universities and the established private providers, such as the various theological consortia.

The Melbourne College of Divinity believes that a national accrediting body for the private sector is an urgent necessity. To show its good faith the MCD is prepared to consider submitting itself to such a national body even though it has had for eighty seven (87) years the absolute right to confer degrees under parliamentary authority.

Attention is drawn to the following points.

a The Commonwealth has a responsibility to ensure standards of excellence in this as in other areas of tertiary study.

b The necessity of the constant monitoring, development and administration of these degrees.

c The values, culture, attitudes and structure of much of Australian society derive from the Judeo-Christian heritage.

d The importance of the study of belief and value systems in a multicultural society.

e The need for this study to be affirmed by and open to engagement with other tertiary study in Australia.

f The requirement for accountability to the faith communities represented on the College, and to society and the academic community.

g The accountability which already exists to Parliament.

h The degrees and diplomas are conferred and awarded by authority granted by statute.

i The need not to continue an injustice to students of theology in any religious tradition in Australia.

j On the grounds of equity support should be given for professional training in this area as in other areas of professional training.

k The College already has Jewish academics teaching in the Bachelor of Theology programme and is open to further such co-operation from other religious communities, and would support appropriate funding for similar purposes for such religious communities.

3. The College welcomes the reference to the matter of taxation incentives on p.73 where it is noted that a submission was made for

the introduction of taxation incentives to encourage savings and investment for educational purposes (public institutions enjoy a tax deduction for gifts for recurrent purposes but private institutions do not).

The College strongly supports this submission and urges the Committee to pursue it vigorously in its final report.

4. The College is aware that Australian Postgraduate Awards (with Stipend) have been allocated to the University of Notre Dame (as advertised in The Australian - Higher Education Supplement on Wednesday 10th December 1997). We again request that similar consideration be given to the MCD which has the largest research base of any Australian theological institution or faculty (currently over 300 postgraduate students and 120 faculty) and which has set, since 1910, the standard by which Australian theological degrees have been judged internationally. The College re-iterates its request, made in various ways every year since 1994, for an allocation of ten (10) APAs.

for and behalf of the Melbourne College of Divinity

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Dean

