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15 September 2023

Hon Jason Clare MP
Minister for Education
Support for Students Consultation
Website: https://submit.dese.gov.au/jfe/form/SV_6G3DONI83AFNZJA

Dear Minister,

**Support for Students Consultation Paper
Submission from Macquarie University**

Thank you for the opportunity to respond to the Support for Students Policy consultation paper and on measures that might be mandated in the Guidelines.

We take seriously our responsibility to ensure that our students are genuinely engaged in their studies, advancing through their degree programs, and successfully graduating. Our primary focus is on our students' experience and the high-quality, transformative education we offer.

Macquarie University strongly supports in principle the general intent of the policy which aims to advance support for students. We do, however, have concerns about the potential scope for unintended consequences, and the severity of financial penalties being considered. Aspects of the guidelines that we argue may have unintended consequences are considered below.

Disincentive to enrolling students at risk

We are concerned that some of the proposed measures may encourage universities to reduce their exposure to students who may be at risk of not completing their studies. These 'at risk' students are likely to include Aboriginal and Torres Strait Islander, first-in-family, lower socio-economic, and part-time students who generally have lower success rates. This outcome would be an unintended consequence of the Bill's specific goal and the government's broader objectives of increasing access for underrepresented students.

We are concerned that not only will there be a disincentive to admit students from underrepresented backgrounds to a degree program, but that strengthened processes to assess students' academic suitability to continue, and risk mitigation efforts in ensuring compliance with the Support for Students Policy, may also lead to universities withdrawing a student's enrolment more quickly following early academic failure, rather than having an opportunity to learn from failure and get the support they need to continue their studies successfully.

The ability of students to file a complaint if they fail or feel they are at risk of failing is a major departure from current policy. Academic failure at some point throughout the student journey is not uncommon. A policy whereby students may focus on lodging a complaint if they believe they are at risk of failure may detract from a focus on building their learning and resilience to achieve success. Furthermore, there is a risk that students who would otherwise recover and go on to pass their degree would be assessed as not academically suited to continue and be withdrawn from enrolment. A response that could prevent a student from continuing their education unfairly penalises first year students—arguably the most vulnerable group—with a potentially disproportionate impact on equity students who may have additional challenges in transitioning into university life. The period of adjustment to university may be reflective of other additional pressures, as opposed to a reflection of aptitude or suitability for study.

Existing incentives to maximise retention

The introduction of new legislation notwithstanding, there already exists a financial incentive for institutions to retain as many students as possible. Institutions rely heavily on tuition fees as a primary revenue stream, and attrition carries significant financial costs. Government statistics show that in 2020, 19% of domestic bachelor students either dropped out completely or transferred to a different institution nationally. Although a recently published figure for the national cost of attrition is not yet available, it is estimated to exceed \$1 billion annually.

Attrition also carries a multitude of non-financial costs beyond the balance sheet that affect individuals, institutions, and society at large. Students who do not complete their education may face reduced career opportunities and lower earnings potential. Every student who leaves Macquarie without completing their studies misses the opportunity to transform their life through the distinctive education that we offer. We care deeply about this and focus specifically on student retention and success throughout the Macquarie Advantage education strategy that we will soon launch.

Broadened scope of data collection

We support the use of learning analytics, AI, and predictive modelling to identify students at risk with more accuracy and precision. We also agree that, where possible, institutions should review the enrolment of all students who have not engaged in their studies to an agreed level by the census date.

The path from enrolment to graduation is never entirely predictable. The more data that is available to a university, the better the likelihood of more accurate predictive modelling. However, we are concerned that enhancements in this space could lead to an unacceptable intrusion into student privacy and the capture of data including financial or medical data that could adversely affect successful completion. While some universities globally do collect data on family income and medical history for modelling purposes, this is not currently considered acceptable practice in Australia.

Grade inflation

The mandate to include '*targeted in-course support from academic staff such as check-ins, and flexibility on assessment arrangements*', places responsibility for compliance on individual members of academic staff. While the intention is to foster a more supportive and adaptable learning environment, in essence it places the onus on staff members to adapt assessments to meet each individual student's unique needs.

Rather than risk non-compliance or a student complaint about assessment arrangements not suiting their specific needs, academic staff may feel pressure to comply with the mandate and mark more leniently, particularly at the pass / fail point. We have concerns that the unintended and long-term consequences of this could include the lowering of academic standards nationally, which could negatively impact the quality of our higher education and the global competitiveness of our graduates.

Implementing changes

The Guidelines overlook TEQSA's existing remit to provide oversight in this area. The University already meets rigorous regulatory requirements. Under rules that TEQSA administers, we have transparent guidelines for students who fail subjects so that issues are identified in a timely manner, and students are supported.

We have begun examining the impact of prospective changes on our existing policy suite. Macquarie will need reasonable time to implement required changes and the paper fails to acknowledge the additional resources required. We are a university with more than 46,000 students with different attendance types and modes of learning (on campus, online and hybrid) studying hundreds of courses.

New policies to encourage universities to support student success should be designed without unduly penalising them. The paper outlines instances where a university could be issued a notice of infringement but does not clearly define the criteria for identifying non-compliance or the formal procedure to address complaints from students who have failed (point 2 of the 'Non-compliance' section), or students at risk of failing (point 3).

We ask that care is taken to avoid unintended consequences that could have a significant impact on universities and students. We look forward to further consultation and welcome an opportunity to provide more detail on any of the matters raised.

Yours sincerely,

Rorden Wilkinson