

Hon. Jason Clare MP
Minister for Education
Department of Education
GPO Box 9880
Canberra ACT 2601

15 September 2023

Dear Minister,


Thank you for the opportunity to provide feedback on the *Support for Students Policy Guidelines – Consultation Paper*. In formulating our feedback we have considered the broad context in which Federation University Australia operates and have made an internal assessment of our ability to meet the proposed new requirements.

Federation University agrees that stronger governance and student support in universities is vital to ensure that all students have the opportunity to succeed.

In addition to responding to the specific questions raised in the consultation paper, we have highlighted areas needing further clarification and advised where it is not possible for us to meet proposed timeframes.

In summary, we would be able to achieve many of the proposed requirements in time for Semester 1, 2024. However, we respectfully request a more phased approach to implementation (as outlined in our following response) to enable us to ensure our staffing, systems and processes can adequately meet expectations.

Yours sincerely,



Mr Liam Sloan
Acting Vice-Chancellor

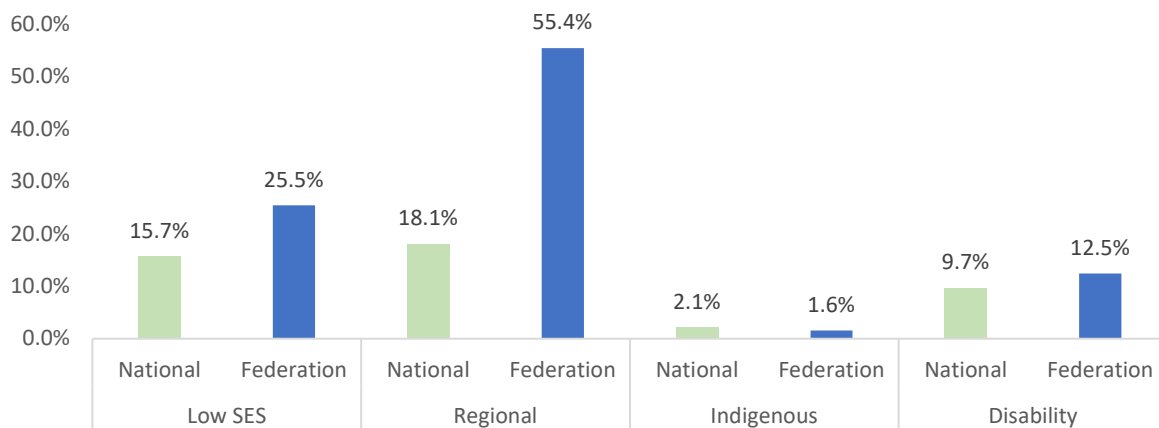
Federation University Australia response to the *Support for Students Policy – Guidelines Consultation Paper*

Operational Context

As a small, regional university there are constraints that need to be taken into consideration. One of the biggest challenges in meeting the additional requirements is that Federation does not have the economies of scale of larger universities. Our resources are constrained by lower student numbers by both headcount and, due to our student demographics, EFTSL. This means that our associated revenue is also lower.

Our student population also has a higher representation of students from low SES and regional backgrounds and students with disabilities compared to the national rate (see Figure 1). This means that the support needs of our students are inherently higher than universities with a different equity profile.

Figure 1: Participation rates - National vs Federation, 2021



Source: 2021 Equity Performance Data, Department of Education

We are concerned that the largest burden of implementing certain parts of this policy will fall on those institutions least resourced to manage it. In particular, the investment in people and systems required to meet these expectations will require additional funding to be allocated.

Section 1: Further clarity required

(Q3: What other detail should be included in the Guidelines and why?)

- The proposed “Academic Development Advisor” roles are undefined, and therefore impossible confirm compliance at this point. It seems likely that these are new roles which will require scoping, funding allocation, recruitment, onboarding and training in addition to potential system/process changes.
- It is unclear whether students studying Australian university courses at offshore partner locations are included in this proposal. Given the additional complexities of local law, governance and support structures we would advise the Department that they should not be.
- As indicated throughout this response, these changes will require additional resourcing. Given that many universities operate with minimal surplus and budgets are often accounted for a year or more into the future, will additional financial support be provided through the

government to support these changes, or is the expectation that universities absorb the full cost?

- It is unclear what the government considers “sufficient resourcing” for student support. Will appropriate guidelines/staff:student ratios be provided or will this be at institutions’ discretion? If the latter, how will this be monitored and reported upon?
- Further clarity is also required regarding reporting requirements, especially the level of detail required in reporting on “identified” students. Could the Department provide an example report as part of the revised guidelines?

Section 2: Concerns of feasibility within timeframe

Q4: Are the proposed individual student and institutional level requirements practical, and implementable? If not, how could they be improved?;

Q9: What practical considerations need to be taken into account in implementing the Guidelines?

We have made an internal assessment of our ability to meet the new requirements and have identified several feasibility issues associated with implementation for Semester 1, 2024:

- Whilst Federation University has robust processes in place for identifying and flagging at-risk students, and well-established support referral protocols, in order to capture a whole-of-student view for engagement with services - as is implied in the consultation paper - would require significant enhancements to existing/development of new systems and processes to ensure a unified, reportable approach.
- Federation University enrolls a significant number of students via onshore partner provider institutions. Third party providers may use different monitoring systems and are resourced differently. Additional time will be required to unify approaches..
- Where a student is in need of additional support in literacy or numeracy, ad hoc support may be available via other academic support services, and/or they can access individual enabling units whilst intermitted from their course. Ensuring adequate targeted, individual literacy and numeracy support is unfeasible by Semester 1, 2024 and will require further investment.

Section 3: Reporting implications

Q4: Are the proposed individual student and institutional level requirements practical, and implementable? If not, how could they be improved?;

Q9: What practical considerations need to be taken into account in implementing the Guidelines?

- We are concerned about the student privacy implications of the proposed reporting. If universities are required to report on “the support provided for identified students”, will this mean that universities will be required to internally identify and externally report on individual students’ use of confidential support services such as Counselling and Student Advocacy? If so, this may limit the willingness of students to access such supports, and the impossibility of identifying and reporting on whether a student has accessed external support services makes this requirement unfeasible. Reframing this requirement as “the support provided and/or referrals made for identified students” would strengthen this aspect of the guidelines.
- It is unclear how the “efficacy and effectiveness of the policy” could be measured – student retention and completion cannot be attributed solely to the policy and its implementation.
- The current capacity of Federation University’s data and reporting systems do not support the reporting requirements outlined in the consultation paper. Additional time and resources will be required to increase capacity.

Section 4: Responses to other specific questions raised in the consultation paper

Q1: Are there features of the Code that could also be applied to domestic student support and included in the Guidelines?

- Federation University has identified that the Domestic EAL cohort represents a gap in terms of funding of targeted support, particularly in relation to language ability and adjustment to study. The National Code Section 2.2 requires providers to have a “policy and process for assessing whether the overseas student’s English language proficiency [...] is sufficient to enable them to enter the course”. This requirement could be equally applied to Domestic students, as an additional diagnostic tool enabling early identification of additional support needs.
- Section 9.6 of the National Code states that: “The suspension or cancellation of the overseas student’s enrolment under Standard 9.3 cannot take effect until the internal appeals process is completed, unless the overseas student’s health or wellbeing, or the wellbeing of others, is likely to be at risk.” We recommend that this protection also apply to Domestic students under legislation.

Q2: How do we ensure that the Code and the new arrangements work together effectively?

Federation University notes that the current iteration of the ESOS National Code was published in 2018 – 5 years ago, and before COVID19 changed the landscape of higher (especially international) education delivery and engagement. We therefore recommend that either the ESOS National Code is updated concurrently with and complimentary to the Support of Students guidelines, or that a single new guideline/code is developed which incorporates education provision for all students.

Q5: Are there examples of best practice, reports and reviews that focus on supporting students to complete their studies, that could be drawn on for the Guidelines?

N/A

Q6: What other reporting requirements need to be included to demonstrate compliance with the Support for students policy requirements?

N/A

Q7: Is there other information that should be reported, or that could be re-purposed, that would demonstrate compliance, and assist in monitoring and evaluating the outcomes of these Guidelines?

We would suggest that reporting on preventative measures that were offered/provided (e.g. Pathway Programs, Academic Preparation Programs) would form an important part of a holistic view of how they have been supported by the institution.

Q8: What needs to be taken into account in the Department’s approach to non-compliance?

- Thresholds for Departmental review of providers’ student outcomes and interventions should be published. For example, what number or proportion of students not completing 50% of units or more, or what number of complaints about a provider would trigger further investigation and potential penalties?
- In general, more information on application of penalties in different circumstances needs to be outlined clearly in the final guideline.

Recommendations:

- That all questions and omissions under Section 1 are addressed and clarified in the final Guideline document
- That a phased approach to implementation is adopted to ensure that all providers are able to meet all requirements within the relevant timeframes. We recommend the following milestones:
 - September to December 2023** - Higher education providers to identify gaps in current processes
 - January 2024** - Supports for Students Policy written and published
 - January 2024-December 2024** - Higher education providers to design, map out and roll out solutions for bridging the gap between existing processes and the new requirements. Higher education providers to report on:
 - the numbers of students identified as requiring support, disaggregated by faculty
 - the academic outcomes of the cohort generally
 - HELP expenditure on failed units of study, per student and overall.
 - January 2025** – Implementation of the full suite of new student support and reporting requirements
- That the department clarifies any additional funding that may be available to providers to ensure compliance with the additional requirements
- That specific reporting requirements (including level of detail required in terms of supports provided, and how it is proposed providers measure the efficacy and effectiveness of the policy) are clarified, ideally including a sample report.
- That the two parts of the ESOS National Code identified in Section 5 are applied to all students via this guideline
- That the ESOS National Code is itself reviewed concurrently and with reference to this process.
- That further information about compliance and penalties is provided, in line with responses in Section 5.