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Support for students  
policy (Guidelines  
consultation paper)

**ENQUIRIES**  
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## A. INTRODUCTION

La Trobe University welcomes the opportunity to respond to this consultation.

La Trobe broadly supports the proposed direction of the *Support for Students policy* and its implementation through changes to the Higher Education Provider Guidelines (the Guidelines). In our view, a key benefit of this policy would be to act as a one-stop shop for students – a single touchpoint which clearly articulates and summarises the supports available and the university's responsibilities to support their success under the Threshold Standards.

We however question whether another institutional policy is the most appropriate mechanism through which to achieve the outcome desired by the government. Indeed, La Trobe University, like others across the sector, already has in place a range of policies that provide such information (albeit separately). We also argue that the level of implementation detail required to support improved outcomes (as required by the Guidelines) would often sit at an operational level rather than in policy.

While we largely support the proposed individual student and institutional level requirements, there are elements, such as the assessment of non-academic suitability, which are very hard to implement. We also believe that there should be specific reference for institutions to have a published sexual assault and harassment action plan and to report issues of student safety on campus.

The core challenge is almost always one of the levels of support provided rather than the fact that the policy mechanism exists. For this reason, we would see it as useful for further guidance to be provided regarding the minimum level of support expected by an institution, particularly in view of universities' different and potentially overlapping reporting obligations. We therefore support the fact that the Higher Education Standards Panel (HESP) has been asked to review the application of the Threshold Standards in relation to student support.

Our response to the Consultation Questions is included in Section B and further information about any of the points raised in this submission can be provided upon request.

## B. LA TROBE'S RESPONSE TO CONSULTATION QUESTIONS

### National Code for overseas students

#### **1. Are there features of the Code that could also be applied to domestic student support and included in the Guidelines?**

La Trobe University supports the stronger alignment between the support requirements for domestic and international students. We see value in almost all of the requirements in the Code and would support a single Code for all students provided it addresses issues of scale.

We however do not support the application of Section 6.5 (which requires a provider to designate a member or members of staff to be the official point of contact for an overseas student), to domestic student support. While we agree that it is best practice for a student to have a designated contact, the scale of the system means this would be challenging if applied in the domestic context. In practise, this level of support would generally sit with front line support teams like Student Advising or [Ask La Trobe](#) in the context of our institution.

#### **2. How do we ensure that the Code and the new arrangements work together effectively?**

The Code requirements in relation to 'student support' could be aligned with the new arrangements.

## Changes to Higher Education Provider Guidelines

### 3. What other detail should be included in the Guidelines and why?

Safety of students remains one of La Trobe's highest priorities and the University supports a comprehensive approach to embedding specific requirements to address violence or harm on university campuses. Over the past three years, La Trobe has invested over \$5m of additional funding in our wellbeing and proactive prevention initiatives. As part of any revision to the Guidelines, we encourage the Government to consider what mandatory reporting from the sector may be required, with appropriate reference to broader societal trends.

While all universities should have appropriate mechanisms in place for the management of students in crisis, this is often not detailed in a policy context. It would be useful for universities to have additional guidance about the specific requirements that are expected in this space. We would consider it appropriate to list crisis service availability regarding mental health etc and reference to sexual harm policies as appropriate components of this section.

La Trobe would therefore see value in more specific reference being made in the Support for Students policy for institutions to have a published sexual assault and harassment action plan and to report issues of student safety on campus. It is important to note that monitoring of reported case numbers and outcomes may not necessarily be a reasonable indication of how well a university is responding to or preventing sexual assault and harassment on campus.

Institutions with clear processes and strong support for students may see higher levels of reporting while less proactive institutions may discourage reporting. Consideration of awareness measures may be more appropriate representations of the environment that a university is creating.

### 4. Are the proposed individual student and institutional level requirements practical and implementable? If not, how could they be improved?

La Trobe supports the requirement for institutions to take a proactive approach to supporting student success and identification of students at risk. Since 2018, La Trobe has embedded one of the sector's largest student advising programs (40 Full-Time-Equivalent (FTE) employees, \$5 million), with a focus on supporting at risk students, typically from equity backgrounds, to succeed and progress with their studies. **Many of the proposed requirements detailed in the discussion paper are already embedded within La Trobe's student support eco-system.** Our comments on the specific proposed inclusions are outlined further below.

In terms of review of policies, we do not support an annual review, as proposed by the Paper. University policies are kept under continual review to ensure their ongoing relevance and assure effective implementation. However, this review occurs when new requirements or information comes to light, or as part of a regular review cycle. La Trobe considers an annual updating of the proposed policy to be overly onerous, with a suggestion that a review be conducted instead.

## Support for Individuals

- *"how the higher education provider will assess academic and non-academic suitability for continuing study, especially for students who have already triggered alerts"*

The capacity for an institution to assess academic and non-academic suitability to continue studying is a particularly challenging component of the Guidelines. While the university can identify students at risk and encourage their engagement with support services (such as mental health supports), the university is not in a position to force engagement with services and could run the risk of discriminating against students should we deem them unfit based on factors beyond their unsatisfactory performance. Current academic progress mechanisms will allow institutions to

identify failing students. However, students are the ones who make the choice to reenrol and to seek assistance and it is therefore not until they hit the trigger for 'exclusion' based on academic performance that they would be deemed unsuitable.

- *"Targeted in-course support from academic staff such as check-ins, and flexibility on assessment arrangements"*

We would caution against a mandatory level of academic-led support at the course level. Support should be, as best as possible, informed by an individual student's particular need with reference to the nature of the discipline. It may also be the case that additional support is more appropriately provided by adjunct service areas (such as [Maths Hub at La Trobe](#)). We agree that academics should be checking in on their cohort, providing quality feedback and advising on available support. We are however cautious about proactive offers of special consideration and flexibility of assessment deadlines that may potentially disadvantage students who require support but who have not been identified as at risk. We are supportive however of ensuring that special consideration processes are as accessible and easy to use as possible for students – noting the requirement for appropriate documentation is the most significant barrier for students.

- *"how the higher education provider will provide access to targeted individual literacy, numeracy and other academic supports as required"*

La Trobe broadly supports the need for targeted and personalised support for students, but wishes to highlight that this will always be dependent on the quality and breadth of data an institution may hold on a student. As a student progresses through their study, our algorithms become more specific, and we are able to more accurately predict risk and target our outreach accordingly. There is however no 100% certain prediction of risk and, as such, we advocate for well-designed curriculum, supportive processes and clear and accessible support services to ensure students are able to access the assistance they need.

- *"processes to ensure that students are connected to support, and that non engagement with support triggers escalations before the census date wherever possible"*

The broader question is one of the timings for the assessment of risk. Interventions prior to census date will be challenging to operationalise without significant investment, particularly across an entire cohort every semester. At La Trobe, we are able to identify students at risk and provide proactive support to a limited cohort (those identified at highest risk), prior to census. Ultimately, it is the unsatisfactory progress process that will identify failing students and result in wider scale intervention. The monitoring of students who access referred support will be potentially onerous to monitor and would require significant system integration that not all institutions will currently have in place.

- *"arrangements to provide non-academic supports for students, such as financial assistance, housing information and mental health supports"*

We acknowledge the important roles universities can play in supporting students with these matters but note the wider accountability of the Commonwealth and State governments to primarily provide financial support (via AUSSTUDY/ABSTUDY), healthcare (through the primary healthcare system) and social housing. La Trobe has extended the range of support available to students throughout the COVID-19 pandemic, with more than \$20 million in direct support disbursed over the past three years. As more students from equity backgrounds (with typically higher needs) seek to access higher education, it will be important that support from the Commonwealth and State government(s) is calibrated to enable their success. This is an issue that should also be addressed via the Accord process. Beyond the challenge of encouraging typically underrepresented cohorts to participate in higher education, there is a parallel challenge

to ensure that universities have the means and flexibility to provide student support to enable them to succeed.

### Institutional level requirements

- *“sufficient resourcing is available to adequately support all students identified as requiring additional assistance, including how those resources are adjusted to meet demand”*

It will be difficult to measure the sufficiency of support staffing. The definition of ‘sufficient’ will directly correlate to the cohort demographic and any further guidance that may result from the HESP review of the standards.

### 5. 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?

La Trobe has a number of well-established programs that proactively support students to succeed. The two highest impact programs are our proactive advising Advising program and the Equity first scholarships program.

**Advising program:** La Trobe’s proactive advising program leverages predictive algorithms to identify at risk students and target proactive interventions. Through this program more than 8,000 students were identified and supported in 2022. The impact of the program is substantial, particularly for equity students.

Throughout 2022, the Program delivered the following outcomes:

- +25% increase in retention for high risk commencing students
- +20.1% increase in retention for medium risk commencing students
- +9.7% increase in success for high risk commencing students
- +3.3% increase in success for medium risk commencing students

**Equity first scholarships:** La Trobe invests more than \$4 million per year in scholarships to support students to participate and succeed in their studies. This includes \$5,000 scholarships or living scholarships that close the gap between ABSTUDY for Indigenous students living on campus. La Trobe has an embedded equity-first approach to the selection of scholarship recipients. We recognise the impact of financial support on student outcomes and will continue to prioritise financial support to our students. The impact of this support is clear. As outlined in Figure 1, we have noted higher retention rates and weighted average marks (WAMs) for scholarship recipients compared to those who do not receive a scholarship. The relationship between receiving a scholarship and higher academic achievement appears to be stronger for students from disadvantaged cohorts, suggesting that the provision of scholarships may be effective at reducing the impacts of educational disadvantage on student achievement and retention.

Figure 1: Impact of scholarships on retention and Weighted Average Mark (WAM)

Cohort	Retention Differential	WAM(GPA) Differential
All recipients	+12.1%	+6.9
Low-SES Students	+14.8%	+8.5
Regional Students	+15.8%	+7.4
Indigenous Students	+26.5%	+19.9

**6. What other reporting requirements need to be included to demonstrate compliance with the Support for students policy requirements?**

**7. 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?**

- In regard to the proposed reporting requirements, further clarification is required around the expectation of institutions to collect and report on their data and how the Government may seek to measure the efficacy and effectiveness of the policy. There are a number of points in the policy guidance that will be difficult for an institution to monitor, particularly in-subject outreach activities. We also note that the policy effectiveness is separate from the operational effectiveness of the measures implemented as a result. These may be considered the focus of any identified opportunities for improvement, rather than the policy itself.
- Whilst the Tertiary Collection of Student Information (TCSI) system enables more regular reporting to the Commonwealth, the implementation of this system has not been without significant challenges. Although we broadly endorse the need to periodically report to the Commonwealth, a requirement to do so after each census period could be considered overly onerous, particularly at La Trobe where we have 10 standard teaching periods. While our institutional progressions processes occur on a more frequent cycle, we would suggest yearly monitoring sufficient and manageable, particularly considering the level of reporting suggested in the document.
- Further clarification will be needed to determine what criteria are being used to count the number of students requiring support. For example, La Trobe proactively engages with all students displaying at risk characteristics throughout their studies, and this is significantly different to the volume who are supported through our progressions process. The requirement to specifically report on the services provided to at risk students is also challenging to implement. We support the intent that students at risk should be referred to services and we should be able to track their engagement with support. The challenge, however, is the definition of 'at risk'. We would suggest tracking of this kind be put in place for students who have failed and then subsequently reach stage 1 of an institution's academic progressions process.

**8. What needs to be taken into account in the Department's approach to non-compliance?**

La Trobe supports greater accountability for institutions in supporting student success and enacting policies related to academic progression. To enact the non-compliance measures suggested in the document, it will be critical that further clarification is made available with respect to the scope and timing of the identification required (before census, within subject, post subject).

**9. What practical considerations need to be taken into account in implementing the Guidelines?**

Providers should be granted sufficient time to assess any gaps in their current systems and to put in place the right mechanisms to address the new requirements.