SUBMISSION TO
SUPPORT FOR STUDENTS POLICY CONSULTATION
15 September 2023

ACKNOWLEDGMENT OF COUNTRY

Monash University recognises that its Australian campuses are located on the unceded lands of the people of the Kulin Nations, and pays it respects to their Elders, past and present.

INTRODUCTION

Monash University is committed to supporting all students to succeed, irrespective of their mode of study, level of study or fund source.

We share the concern for students that is driving the proposed additions to the existing Higher Education Provider Guidelines, however it is our strong belief that the existing framework of regulations, standards and guidelines already address those concerns.

To avoid duplication and in line with a best-practice risk-based approach, we recommend that:

- The need for the policy be reconsidered in light of the existing obligations of higher education providers through the Higher Education Standards Framework, the Higher Education Support Act and the National Code and existing assessments of risk such as TEQSA's annual Risk Assessment cycle.
- Table A providers, already compliant with the Higher Education Standards Framework, be exempt from the requirement to have and to report on a *Support for students policy*, in the same way they are exempt from the requirement to have HESA/Higher Education Provider Guidelines-specific grievance procedure.
- Table A providers continue to report to the Higher Education Data Collection (TCSI) and on quality and accountability as required by Mission Based Compacts.

We query how additional, duplicative reporting will provide meaningful benefit for students. External reporting risks shifting the focus away from supporting students. Providers across the sector have limited resources and every additional regulatory burden, including new reporting requirements, impose an opportunity cost, which will be borne somewhere else in the institution.

A proportionate approach to risk, using lead indicator data and existing assessments that sit at the 'whole of institution' level and which apply to all students, regardless of fund source, should be adopted to ensure efficiency of effort while maintaining appropriate scrutiny on providers.

DISCUSSION

CURRENT STUDENT SUPPORT MEASURES

Rather than building on existing legislative requirements, we are concerned that the *Support for students* policy will duplicate existing obligations, introducing overlap and potential inconsistencies in data collections and reporting.

Considering the National Code specifically, it is a consumer protection mechanism for international students, including the use of education agents. Elements of the National Code are already applied to domestic student support, such as through the Admissions Transparency Scheme, introduced in 2018, with the aim of providing clear and readily comparable information on higher education admission requirements and processes.

At Monash University, support services provided to international students are equally provided to domestic students. The National Code and the proposed *Support for students policy* apply to distinct student cohorts. In particular, we note that the National Code applies to all international students regardless of level and location of study while the Guidelines only apply to students enrolled in higher education. They should be kept separate to remain effective to their different scope.

Additionally, given the outcomes of the most recent review of the ESOS Framework haven't been released and the structure and content of the National Code may change, it may be premature to recommend any alignment.

PROPOSED CHANGES TO HIGHER EDUCATION PROVIDER GUIDELINES

General

A mapping of the prescribed elements of the proposed *Support for students policy* to existing obligations under the *Higher Education Standards Framework*, *Higher Education Support Act* and the *National Code,* and to current Monash policies and procedures shows that all of the proposed elements exist within existing processes and reporting requirements of Table A providers. (Refer to Appendix)

- If a Support for students policy is introduced to the Guidelines, Monash recommends that Table A Providers, already compliant with the Higher Education Standards Framework be exempt, in the same way that Table A Providers are exempt from the Guidelines requirement to have a HESA-specific grievance procedure for complaint management[1]. This exemption would allow universities to focus on implementing their comprehensive quality assurance practices that already address student support, and are applied equally across all student cohorts, rather than having a specific focus on HESA-regulated activity.

  This exemption should also extend to the associated reporting requirements proposed under 'Reporting' in the consultation paper, but not to existing requirements under HESA for universities to report data for the Higher Education Data Collection (TCSI)[2] and its quality and accountability requirements, as agreed in the Mission Based Compact[3] between the Commonwealth and Monash University. These existing obligations promote the accountability of public universities and capture all student cohorts in their remit, ensuring that all students have the same access to appropriate levels of support.

- In any eventuality, Monash recommends that a risk-based approach to reporting be implemented, rather than requiring all providers implement the new Guidelines from 2024. For example:
  - aspects of the proposed reporting Guidelines are available via desk-top auditing, which can be assessed on a needs basis
  - if a provider demonstrates that they are falling under the expected pass rate, then additional scrutiny is placed on admission standards and student support measures and the provider is required to respond to the the requirements
  - providers who do not fall under the expected pass rate are exempt from reporting across all metrics, until the following annual reporting period.

We also note TEQSA's annual Risk Assessment cycle where an assessment of 'Risk to Students' is measured, alongside existing requirements under HESA for universities to report data for the Higher Education Data Collection (TCSI)[4] and the quality and accountability requirements, as agreed in the Mission Based Compact[5] between the Commonwealth and public universities.

Support for students

As noted in the consultation paper, students may fail units for a number of reasons and it is not realistic to achieve 100% pass rates in all units, irrespective of the level of support provided to the student.

The census date is an important point to ensure that students are aware of the financial implications of proceeding beyond this point and Monash targets considerable efforts to identify and support at-risk students before the date. However, disengagement will look different for different students and risk of failure can occur anytime throughout a teaching period.

Reporting

The *Higher Education Standards Framework* requires that extensive institutional reporting and review processes are undertaken across university operations in order to maintain compliance with, for example, the Institutional Quality Assurance and Governance and Accountability Standards.

Monash meets these obligations via reporting on activities such as Student Academic Progress (addressed in more detail below), Special Consideration, Student Evaluation of Teaching Units, and units with high numbers of failing students. Additional reporting includes academic and English pathway analysis and special entry scheme analysis to review students progress and comparison to the rest of the cohort. These reporting obligations contribute to Monash's understanding of how students are progressing through a course of study, evaluation of teaching quality, and ensuring student feedback is incorporated into unit and course review.

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[1] see HESA Chapter 4 subsections 19-45(1)(a) and (b) and subsection 19-45(2)
[2] see TCSI University Requirements
[3] see 2021 – 2023 Mission Based Compact between the Commonwealth and Monash University
[4] see TCSI University Requirements
[5] see 2021 – 2023 Mission Based Compact between the Commonwealth and Monash University

Monash regularly reports on academic progress, student support, and student experience through University governance structures (University Education Committee, Academic Board, University Council and Council subcommittees This is additional to the regulatory reporting to TEQSA and as part of the TCSI. We also note that progress, retention and completion are in themselves an important indicator of student achievement and success already compiled across the sector.

Monash queries the reasoning behind some of the proposed new reporting requirements and how this reporting would be useful in supporting students to succeed. For example:

- *the numbers of students identified as requiring support, disaggregated by faculty.* Each institution organises its disciplines and studies in different ways and students may be enrolled in units across more than one faculty for example more than 35% of Monash students are enrolled in double degrees and attribution of a single faculty would be inaccurate and more than x% of Monash students study units outside their enrolling faculty.
- *HELP expenditure on failed units of study, per student and overall.* This is a measure of student debt incurred on a failed unit and is a matter for the Commonwealth and the student. It does not include student expenditure on failed units for which a HELP loan is not used. How will this information be useful in supporting students?

- Additional external reporting will require additional resourcing and risks shifting the focus away from supporting students. At a minimum, we recommend that the timing of any reporting be annual after the completion of each academic year. Reporting after a census date but before the end of the unit will not enable the provision of complete data. Requiring institutions to report at multiple points is inefficient and will add to the regulatory burden.

Practical Implementation

The requirements of the proposed *Support for students policy* are not practical for implementation at scale.

Monash University offers more than 40 teaching periods each year of varying lengths, each with their own census date.

Monash is piloting the use of data to identify students at-risk of triggering the 50 per cent fail clause and contacting them during a teaching period, but this is limited and can only use set indicators for all students due to the volume of students, different courses and multiple teaching periods. All students determined to be at risk are referred to support services. Our pilot data has shown that set indicators are not entirely predictive of unit failure and the reasons are complex and unique for each student. Students can become disengaged at any time during a teaching period and the indicators vary significantly.

- The *Support for students policy* should instead include a requirement for institutions to have clear communications to students about what census dates are and the financial and academic implications of continuing study beyond the census date.

Best practice student support

Monash's retention rates are consistently among the highest nationally, sitting above 90 per cent. This is a result of our best-practice approach to student success which aligns with the intent of this policy to support all students to achieve their learning goals. Core elements are described below, along with two case studies that demonstrate how our approach works in practice.

Monash provides information to students about the support services available to them at various points of their studies, however, we cannot compel students to engage with any university services. Nor is it practical to track engagement with these services as recommendations to the services may be provided by the educator, student course advisor or other support professional, in various ways and at various times. Students may also seek support from external services.

We have a lot of data relating to student engagement with services however we cannot disaggregate it relative to the unit being studied. There are also privacy implications with monitoring and reporting individual students' engagement with support services, and these privacy considerations may limit any connection between a student seeking support and their ability to successfully continue their enrolment in a unit of study. Indicators of disengagement in a unit are varied and the cause may not relate simply to academic success. Further, indicators are not always reliable and it is unreasonable to assume these students will not be successful in their studies. It is important that students continue to have agency and seeking support should not be or perceived to be a punitive or monitored process.

Proactive identification and monitoring

Monash's Academic Progress Policies support the regular identification of students who are at risk of unsatisfactory progress using set triggers, including first unit fails and multiple unit fails. Students' course completion dates are also monitored and students who will be unable to complete their course in the maximum timeline are often excluded. Students with a higher risk of not progressing in their course are directed, by professional or academic staff, to support services and conditions may be imposed on their enrolment.

Each year more than 10,000 Monash students are identified to be at-risk via academic progress processes and fewer than 3 percent of them are excluded from their course either because they improve their academic performance, reach out to support services or otherwise meet their conditions of enrolment. Failure to comply with enrolment conditions can

result in a student being excluded in the next review period. These measures ensure that students do not continue in a course of study they cannot complete or are not suited to, and accrue unnecessary debt.

Monash seeks clarity on the nature of 'targeted support' as outlined in the consultation paper, and cautions that practical arrangements including budget and workforce planning must be taken into consideration. Personalised academic support services are most commonly opt-in, which means that University resources are directed on a needs-basis and offered at scale.

A broad range of individualised central academic supports are available for Monash students on an opt-in basis, in addition to support that is provided at a unit- and faculty-level. This includes access to tailored Academic Study Support skills, English language skills, maths skills and course advice. For example, all Monash students have access to in-semester one-on-one consultations with Student Academic Success advisors who provide language, learning and study skills support, such as academic writing, critical thinking, time management and exam revision. Tailored course-related support is also available and easily accessible. A resource hub is also available and actively promoted to students - see LearnHQ.

Proactive offers of special consideration and adjustments

Fair and equitable assessments and special consideration processes are available to all students. At Monash, assessment adjustments are reasonable adjustments made to assessment requirements or conduct of an assessment to accommodate and support the independent study of students registered with Disability Support Services. Special consideration is available for students who are unable to undertake an assessment task due to immediate and exceptional circumstances beyond their control. Students are provided information on University services, support and policies throughout their enrolment and through various means - unit information, central support, regular communications, student representative bodies and the learning management system.

Special Consideration is a centralised process so that students experiencing similar circumstances are offered the same outcomes. Students registered with Disability Support Services register once and have adjustments applied proactively for the remainder of their degree, or as required.

Additionally, Monash provides all prospective and current students with information relating to any inherent requirements (such as abilities, knowledge, and skills) relating to their course[6] - this information allows students to make an informed decision prior to enrolling in a course.

- Given the complexities, it is essential that sufficient context, flexibility and data is applied to any legislation, policy, and targets for underrepresented or non-traditional students, to ensure that organisations who are driving better access, support and outcomes for those students aren't penalised or restricted.

Monash University case studies

These case studies show timely support and intervention for a student (i) who was at risk in their studies and was able to return to satisfactory progress and another student (ii) who failed many units and was excluded because they were determined to be unfit to continue. Both students met the their course admission requirements.

Case study 1: A student in the Faculty of Science failed 3 out of 4 units in a semester.

- The student completed a Monash support tool and was provided with a tailored list of recommendations based on their responses about the issues impacting their academic performance, including struggling to transition to university.
- The faculty reviewed their circumstances and set an enrolment condition for the student to enrol in no more than 3 units in semester 1, 2023.
- The student attended a support meeting, where the faculty recommended they enrol in a Peer Assisted Study Session, an academic support program of guided study groups for students enrolled in specific units and meeting with a Student Academic Success advisor to understand how to prepare for an assessment and writing using academic language.

  In the next semester, the student complied with the enrolment condition and recommendations, passed all units and returned to satisfactory academic progress.

Case study 2: A Faculty of Information Technology student failed all units except one over three semesters since commencing their course (9 out of 12 units).

- In their first semester, the student failed 50 per cent of their units and was asked to attend a Support Meeting with the Course Coordinator to discuss their progress.

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[6] See Monash's Inherent requirements webpage

- The student failed to attend the meeting and no reason was provided.
- In their second semester, they failed more than 50 per cent of their units but were allowed to continue providing they enrolled, and passed, no more than 2 units, including one specific unit. They were also recommended to meet with the Monash counselling team and Disability Support Services.
- The student chose instead to enrol in 4 units in their third semester.
- The student was referred to the faculty's Academic Progress Committee and asked to demonstrate how they could be successful in the course and to plan for passing units in the upcoming semester.
- The committee determined that
    - the student had taken insufficient actions to address the clear indicators that their performance had not been satisfactory, including non-engagement with the enrolment conditions and recommendations.
    - it was unlikely that the student would be able to complete all course requirements within the permitted maximum course duration.

Following the hearing the student was excluded from the course.

ATTACHMENT: MAPPING OF PROPOSED SUPPORT FOR STUDENTS POLICY TO EXISTING FRAMEWORKS AND MONASH UNIVERSITY POLICY AND PROCEDURE

Summary of requirements of the proposed *Support for students policy*	Summary of existing reference in HESF & National Code	Clauses of Higher Education Standards Framework (Threshold Standards) 2021	Clauses of National Code of Practice 2018	Monash Policy Bank	Monash Procedure & Controls
Support for individuals					
Assess academic and non-academic suitability for continuing study, especially for students who have already triggered alerts	**Assess suitability for continuing study, especially for alerted students:** Evaluate academic and non-academic readiness.	Domain 1 Student Participation and Attainment. ● Clear admission criteria, including academic readiness. ● Credit for prior learning doesn't harm student or course integrity. ● Orientation, transition support, early feedback, risk detection, and success monitoring. Domain 2: Learning environment 2.2 Diversity & Equity ● creation of equivalent opportunities for academic success regardless of students' backgrounds	Standard 2 ● Ensure responsible recruitment: ● Verify student qualifications, English proficiency, and relevant experience. ● Provide cost-of-living and accommodation details in Australia. ● For under-18 students, explain the welfare and accommodation approval process.	● Admission and Credit Policy ● Enrolment and Timetable Policy ● Student Academic Progress Policy ● Assessment and Academic Integrity Policy	● Admission to Coursework Courses and Units Procedure ● Enrolment Procedure ● Student Academic Progress Procedure ● Academic Progress Committee Procedure ● Exclusion Appeals Procedure ● Marking and Feedback Procedure
Identify students at risk of not successfully completing units of study		● give specific consideration to the recruitment, admission, participation and completion of Aboriginal and Torres Strait Islander peoples 2.3 Wellbeing and Safety ● 2.3.1 avenues and contacts for support for students if needed ● 2.3.2 availability of specific types of personal support services	Standard 1 involves Australian Consumer Law, ensuring no false or misleading information about courses or outcomes is given to international students by registered providers. Standard 6	Student Academic Progress Policy	● Student Academic Progress Procedure ● Academic Progress Committee Procedure

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		• 2.3.3 ensuring that support services offered reflect the needs of student cohorts • 2.3.4 promotion of a safe environment • 2.3.5 management of critical incidents. Domain 3: Teaching • coherent achievement of learning outcomes and professional accreditation of a course of study if applicable • sufficiency of staffing, capability of teaching staff, student access to staff • the nature, appropriateness, quality and level of access to learning resources that are specific to the course of study.			
Processes to ensure students are connected to support and that non-engagement triggers escalations before the census date wherever possible	**Ensure connection to support and non-engagement escalation:** Connect students to help and escalate non-engagement issues.	2.3 Wellbeing and Safety 2.2 Diversity & Equity	Standard 6	Learning and Teaching Student Engagement Procedure Learning and Teaching Quality Procedure	Assessment feedback is given to students at the midpoint of the teaching period and allows all students to see their progress and seek support if needed
Provide non-academic supports (e.g., financial assistance, housing information, mental health supports) – crucial for		2.3 Wellbeing and Safety 2.2 Diversity & Equity	Standard 6 • Provide international students with support information for	Student support services	Student support services

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addressing non-academic challenges faced by students			adjusting to life and study in Australia. ● Share details of services available for employment rights and issue resolution through the Fair Work Ombudsman. ● Offer no-cost support to attain learning goals for all study modes. ● Maintain a policy for managing critical incidents affecting international students. ● Ensure campus safety and provide safety guidance. ● Provide general safety awareness info to international students.		
Provide access to targeted individual literacy, numeracy, and other academic supports as required	**Provide targeted academic assistance:** Offer personalised literacy, numeracy, and academic support.		Standard 6		Learning and Teaching Student Engagement Procedure
List circumstances leading to proactive offers of 'special consideration' and academic adjustment arrangements for students affected by significant life events				Student support services	Special Consideration Procedure
Offer innovative provider-driven and evidence-based additional supports such as peer support	**Innovative support and crisis response:** Implement peer Support,				Inherent requirements

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	academic staff check-ins, and crisis response.				
Provide targeted in-course support from academic staff (e.g., check-ins, flexible assessment arrangements)					Learning and Teaching Student Engagement Procedure
Ensure appropriate crisis and critical harm response arrangements for students				Community Safety and Security Policy	Community Safety and Security Policy
Institutional Level Requirements					
Make sure academic and non-academic supports are age and culturally appropriate, including specific arrangements for First Nations students	**Appropriate and specific support:** Tailor age and culturally suitable assistance, especially for First Nations students.	Domain 1 Student Participation and Attainment. 1.3 Orientation and Progression …tailored to the needs of student cohorts … Domain 2: Learning environment 2.2 Diversity & Equity ● creation of equivalent opportunities for academic success regardless of students' backgrounds ● give specific consideration to the recruitment, admission, participation and completion of Aboriginal and Torres Strait Islander peoples	Standard 5 ● international students under the age of 18 must meet any Commonwealth, state or territory legislation, or other regulatory requirements relating to child welfare and protection appropriate to the jurisdiction(s) in which they operate ● processes to monitor any third parties engaged by the registered provider to organise and assess welfare and accommodation arrangements	Learning and Teaching Student Engagement Procedure	earning and Teaching Student Engagement Procedure 1.3 In line with the Equity, Diversity and Anti-discrimination Policy, transition services and activities will be accessible to and respectful of the diversity of the student population, including Indigenous students, mature age students, students with a disability or medical condition, students with a low income, and students with carer responsibilities.
Implement assurance mechanisms to ensure the policy is faithfully and fairly executed				● Student Academic Progress Procedure	…1.1 The managing faculty will review the academic progress of students at the end of

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and to identify errors, outliers, and areas for improvement				• Academic Progress Committee Procedure • Policy Framework Policy	two academic progress periods and the academic risk level is based on that review:
Assure sufficient resources are available to support all students needing assistance, with adjustments made to meet demand	**Sufficient resources and access to advisors:** Ensure resources for all and access to specialised advisors.				• Student Academic Progress Procedure • Academic Progress Committee Procedure
Provide access to trained academic development advisors specialising in identifying reasons why students struggle and devising appropriate responses		Domain 1 Student Participation and Attainment.		Learning and Teaching Student Engagement Procedure	Monash student academic success advisors provide this support. Monash's Orientation and Transition Framework sets out the model for delivering orientation and transition activities for all faculties, business units and campuses.
Guidelines for Support for Students Policy					
Must be publicly accessible on the university's website, with support options widely communicated to students	**Public accessibility and communication:** Make the policy public and communicate available support.	**Domain 7 Representation, Information and Information Management** **7.2. Information for Prospective and Current Students** • Provide accurate, accessible, and timely information for informed decision-making, including students with special needs.		Monash Policy Bank	Monash Student Support

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		• Offer info on accessing services (e.g., educational, English language, personal, cultural), including hours, access methods, and emergency contacts.			
Should be updated annually	**Regular updates:** Keep the policy updated annually Annual submission of Higher Education Data Collection (TCSI)[7] under HESA				Annual submission of Higher Education Data Collection (TCSI) under HESA Quality and accountability requirements in the Mission Based Compact[8] between the Commonwealth and Monash University

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[7] TCSI University Requirements

[8] 2021 – 2023 Mission Based Compact between the Commonwealth and Monash University