

## Department of Education

# Support for students policy – Guidelines consultation

## Response by University of Canberra

September 2023

University of Canberra welcomes consultation on the *Higher Education Provider Guidelines 2023* and is keen to participate in discussion.

The Guidelines will need to be updated to specify details around the ‘support for students policy’ to replace the ‘50% rule’. We note consultation currently underway by the Department of Education and the *Support for students policy, Guidelines consultation paper*.

The context for this policy change is an interim recommendation flowing from the ongoing review underpinning an Australian Universities Accord. That recommendation is to cease the punitive ‘50% rule’ and replace it with strengthened measures around student support.

The strong headline message around the interim stage of the Accord remains the need for improvements in access and equity.

While the Accord Panel will finalise its recommendations later this year, the Government has moved quickly on five immediate priorities. These begin to directly address equity outcomes as well as some steps towards funding stability and improved governance arrangements. We welcome the Government’s acceptance of these recommendations, with legislation already introduced to enact removal of the 50% rule and extension of demand driven CSPs to all First Nations students. These immediate priorities align with those articulated by University of Canberra in its Accord submissions.

The University is well placed to comment on this matter. We are committed to equity, diversity, inclusion, and access, and aim to be a university of choice for underrepresented groups. In both 2021 and 2022 University of Canberra was ranked first in the world against SDG10 Reduced Inequalities in the Times Higher Education Impact Rankings. Our record in this area includes high proportions of first-generation students, international students from low-income nations, and students with disabilities.

We are a member of the Innovative Research Universities (IRU) and our Vice-Chancellor Professor Paddy Nixon commenced as Chair of the network from January 2023.

**We strongly support the positions presented in the IRU submission on this matter. That is, agreement that**

- **universities should have in place a ‘Support for Students Policy’ that identifies students at risk of failing and provides interventions to support completion.**
- **the Minister and Department should work cooperatively with TEQSA and wait to receive advice from the Higher Education Standards Panel on the efficacy of current student support instruments before implementing further changes.**
- **compliance with any new changes be piloted for a year before being fully implemented.**

In this submission we offer additional comments that are of particular concern to the University of Canberra. Our position on this matter is that we

**We strongly agree with**

- **removal of the ‘50% rule’**
- **requirement for higher education providers to have, and comply with, a ‘support for students policy’.**

However, we have some concerns with

- **proposed reporting, compliance, university autonomy, and governance arrangements raised in the consultation paper.**

### Removal of the '50% rule'

We welcome the Government's action to cease the '50% pass rule', given its poor equity impacts.

This policy, introduced under the Job-ready Graduates package was to cancel Commonwealth supported enrolment for students who reached the 'low completion rate threshold' by failing at least 50% of their units after completing eight units.

In practice the policy was blunt, with those from disadvantaged groups impacted the most. University of Canberra internal data showed that students from equity backgrounds are approximately 2.5 times more likely than non-equity cohorts to reach low completion.

Universities had great concerns that a perverse outcome of this policy was the potential to perpetuate disadvantage. A provider would not want to label a student as a 'failure', see them exit from tertiary education and be dissuaded from engaging in the future.

### Student support requirements

We note the Government's proposed requirements for a higher education provider to have in place, and comply with, a policy that addresses the support it will provide to their students, in order to assist them to successfully complete the units of study in which they are enrolled.

In introducing legislation, the Minister for Education has suggested that implementing a 'support for students policy' would not be onerous for universities.

*"These requirements are not onerous, particularly for a quality provider fulfilling other requirements under law and meeting community expectations. Support for student success and monitoring of student progress is expected of a modern, quality higher education provider." (Explanatory Memorandum, page 2<sup>1</sup>)*

University for Canberra agrees and has an extensive range of student support measures in place across the student life-cycle from pre-admission to graduation. Our range of support is targeted and proactive across academic and non-academic aspects of a student's university experience.

To deliver on these objectives and support student success across each cohort and each phase of the student lifecycle, a whole-of-institution *Student Success Framework* has been developed. The *Student Success Framework* is closely aligned and works hand-in-hand with the University's *Aboriginal and Torres Strait Islander Strategic Plan*, *Reconciliation Action Plan*, *Student Equity and Access Plan* and the *Student Mental Health and Wellbeing Framework* to ensure a whole-of-University approach to student success across all phases and facets of the student journey.

We anticipate that a University of Canberra 'support for students policy' would not replace existing policies and procedures but would be an over-arching document to draw these together.

University of Canberra advocates for a student-centred approach, by considering cohorts and their support needs. We note the importance to include Higher Degree Research students in this approach.

The University also advocates for a holistic view of student support and note that this is a responsibility shared by universities, government, and communities.

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<sup>1</sup> Explanatory Memorandum *Higher Education Support Amendment (Response to the Australian Universities Accord Interim Report) Bill 2023*, [https://www.aph.gov.au/Parliamentary\\_Business/Bills\\_Legislation/Bills\\_Search\\_Results/Result?bId=r7060](https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bId=r7060)

### Support for Indigenous students

University of Canberra notes that improving access and outcomes for Indigenous students is a key focus of the Australian Universities Accord.

One of the five immediate priorities is to allow all First Nations students, including those living in metropolitan areas, to be eligible for Commonwealth supported places in demand driven higher education courses. We had joined the sector in advocating for this change. In line with its values, the University of Canberra strongly believes that capped funding should not be a barrier to any Aboriginal or Torres Strait Islander undertaking higher education.

While we welcome additional places, support services will be key to success of Indigenous students. It is critical then, that monitoring includes tailored academic support services for Indigenous students.

This will need to be adaptive to emerging trends in higher education. It is important, for example, to ensure Indigenous students receive appropriate support as assessment changes because of Artificial Intelligence and changes in technology. Changes in assessment will necessitate changes in approaches to support.

### Concerns about reporting, compliance, university autonomy, and governance arrangements

While in agreement on the need for student support services, the University does have some concerns around proposed reporting, compliance, university autonomy, and governance arrangements raised in the consultation paper.

#### Support delivery and university autonomy

We strongly argue that universities are best placed to understand where and how student support is needed.

The University has concerns that the consultation paper is based on a simplistic view of the way higher education providers operate, student cohorts and enrolment patterns.

All universities are different. What works for one, may be different to what works for another.

For example, we have a large proportion of students that are mature-aged, with part-time enrolment patterns a key to success. This might contrast with a university of a large cohort of school-leavers.

University of Canberra has a centralised operating model, while others may be heavily devolved. This might require a very different design and location of support services.

Given this diversity, it is not appropriate for the Department of Education, or even TEQSA, to be prescriptive around the structure and delivery of support services.

#### Monitoring student complaints

The consultation paper suggests that to gauge compliance the Department of Education will monitor complaints from students and others (page 9). The University has strong concerns about Department being the right place to understand student complaints. It is vital that student complaints are received and addressed directly by higher education providers in the first instance. Universities have extensive policies and processes in place for complaints that are heavily related to support measures. At present, should a student wish to escalate a complaint, it can be directed to the Ombudsman.

We argue that the Department does not have the background, capability, or expertise to understand student complaints and may view these out of context.

#### Reporting and data integration

The consultation paper proposes reporting back to the Department, with data disaggregated by Faculty. University of Canberra asserts strongly that support information shouldn't be shared at such a granular level to breach student and/or staff privacy. Our strong preference would be for information reported at an institution-wide level.

There are also some indications that support actions and outcomes will be matched against individual student information in the Tertiary Collection of Student Information (TCSI) system. It is our experience that many students access more than one area of support. It would be dangerous and incorrect to assume that one intervention alone may have contributed to a particular graduate outcome.

There are many practical aspects to be worked through on how new reporting would fit with the existing reporting from TCSI. The University notes that official reporting produced from TCSI can be quite lagged. We also note that implementation issues around TCSI are ongoing.

#### Governance and regulatory arrangements

University of Canberra has questions about regulatory and compliance powers in relation to this policy. Where should accountability and scrutiny sit? The discussion paper indicates that monitoring of student support compliance might now sit with the Department of Education. However, the current regulator is the Tertiary Education Quality and Standards Agency (TEQSA).

We know Minister has written to the Higher Education Standards Panel, requesting review of the *Threshold Standards*. It would be useful to wait for this information before implementing any changes.

We note that the Universities Accord is not yet final. The Interim Report has included ideas on forming a Tertiary Education Commission. Should that occur, arrangements on where this policy sits might have to be reviewed.

#### Resourcing

As a general principle, University of Canberra advocates for directing resources to student support rather than more bureaucracy. There are some concerns about the extent to which compliance will involve more 'red tape'. It has already been observed that universities have extensive support for student arrangements in place.