



UNIVERSITY
OF WOLLONGONG
AUSTRALIA

15 September 2023

The Responsible Officer
Higher Education Division
Department of Education
GPO Box 9880
CANBERRA ACT 2601

Re: Support for Students Policy Requirements

Thank you for providing the opportunity to respond to the *Support for Students Policy: Guidelines Consultation Paper*.

We applaud the increased focus on equity in current policy and the University of Wollongong (UOW) strongly supports this policy's goal, ensuring that people who gain access to higher education have the best possible chance of success. The University is pleased to see that the 50% pass rule is to be removed because of the disproportionate impact on students from underrepresented backgrounds in higher education.

The feedback provided by UOW is directed towards the practical implementation of the policy, and in particular the implications of non-compliance on funding arrangements.

Non-compliance

The proposed guidelines outline a range of punitive measures higher education institutions face should they not comply with the policy, including a potential civil penalty based on a provider failing to establish or implement a Support for Students Policy. The paper goes on to provide an example based on a group of ten students failing (one or more units of study – this is not made clear) because the higher education provider did not apply the appropriate support measures. This example underscores the need for clarity around what thresholds might reasonably be set for a higher education provider seeking to implement their policy and strategy for effective student support.

We agree that all higher education providers should have effective monitoring and proactive supports in place to support all students to succeed. However, we are concerned that sanctioning approaches such as fining institutions would have a detrimental impact on the ambition of the higher education sector to increase university access. We welcome an opportunity for future dialogue and implementation of sector wide best practices and guiding principles.

For students from low socioeconomic backgrounds, only 7.6% achieved an ATAR of 90 and above in 2022, compared with 57% for students from high socioeconomic backgrounds (UAC, 2022). In addition to this, 62% of students from low socioeconomic backgrounds enter university from alternate pathways (AARE, 2022).

Professor Patricia M. Davidson PhD, MEd, RN
Vice-Chancellor and President

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Whilst there is substantial evidence to demonstrate that students from low socioeconomic backgrounds do well in their university studies, particularly where they are supported by the university to succeed, we are concerned that an unintended consequence in this policy could lead to a shift in institutional recruitment and admissions to avoid the risk of penalty.

Proposed funding arrangements

Rather than introducing a mechanism that would penalise universities, we believe that the introduction of the *Support for Students Policy* should be linked to metrics related to the implementation of the recommendation outlined in the Accord Report. A 'needs-based funding' model to universities will be critically important. This would enable universities to direct targeted funding to support students to succeed in their studies. Reporting on the expenditure of these funds, combined with student progression data, would achieve a similar level of accountability. The high-cost needs reporting that is undertaken for students with a disability is one example. It is important to balance costs, direct and indirect of regulatory reporting in with allocation of resources in supporting students.

We consider that it will be important that a needs-based funding model prioritises learners who require support, across both international and domestic student cohorts, and to take a whole of institution and inclusive approach to supporting the needs of the diverse student cohorts studying at our universities. Needs based funding will enable universities to more directly target financial, learning (including peer programs) and wellbeing support to students.

Achieving the laudable goals of increasing participation of a broad range of individuals in higher education is a complex and multifaceted issues requiring intervention at the policy, university and student level. We are committed to working with the Department of Education and consider that this will require a range of incentives, levers and monitoring strategies. We consider that engaging in collaborative initiatives, sector wide dialogue and sharing of best practices is more likely to achieve shared goals than a focus on penalties and sanctions.

Thank you for taking the time to review this submission and we look forward to receiving the updated guidelines, and are committed to driving an agenda of quality, equity and participation.

Yours sincerely

A handwritten signature in black ink, appearing to read 'P. Davidson'.

Professor Patricia M. Davidson
Vice-Chancellor and President