



Support for Students Policy Guidelines Consultation

Submission by Deakin University

September 2023

Consultation Paper on Support for students policy requirements – Department of Education.

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Executive summary

Deakin welcomes this opportunity to provide input and comment regarding the proposed changes to policies regulating support systems and approaches for students in the university context.

Deakin joins the Australian Government in our commitment and concerns regarding the approach of the sector to supporting students and ensuring the best possible settings to ensure potential, hard work and opportunity are realised. However, how this is achieved requires careful consideration and we hold several key concerns regarding the proposed approach.

The Australian Government proposes significant additional regulation and management in an effort to enforce support for students studying in higher education. Despite being well intentioned, overly prescriptive guidelines are unlikely to assure good support for students, instead creating considerable perverse risks in deterring engagement with students with additional support needs and diverting funds away from provision to reporting. We note that quality in the sector is already highly regulated through the Higher Education Standards of the TEQSA Act and that considerable information on student enrolment, progression and completion is already provided in real-time through TCSI reporting.

The Australian Government is framing its concerns regarding student success mainly in terms of additional requirements for the sector. Better questions would be: how do we make existing policy requirements more effective; how do we realise accountability for outcomes as already required of our institutions?

Based on this, we note the following key contextual points and guiderails for Deakin's submission:

- Deakin supports the Commonwealth's objective in terms of advancing equity. As outlined in our various submissions to the ongoing Australian Universities Accord process, Deakin is at the forefront of the equity agenda, with a drive towards working with government for true equity, not a tick-box exercise.
- Deakin believes it is a laudable aim to systematise a student support focus across the sector, but this approach is unnecessarily prescriptive for providers with an existing sophisticated policy and practice ecosystem already ensuring multifaceted student support. Enforced micro-management of new stand-alone policy risks disruption of existing good policy. Rather, accountability is key.
- Equity is an outcome of interactions between public policy, institutional practice and students. Government systems are there to support and have oversight of university work; support universities in developing and executing effective programs to address systematic barriers; and support the students themselves via their academic potential, drive and hard work. A system that abrogates the responsibility of any of these three functions is a failed system.
- Nearly all the proposed requirements are already successfully implemented and operational within Deakin, without the proposed excessive regulation of a centralised system. We would welcome the opportunity to demonstrate our systems and in turn, the advantages of an existing process that is meeting and exceeding current and proposed requirements rather than shift to an overly prescriptive red tape model.
- There are already mechanisms at the Commonwealth's disposal to manage these issues through existing quality standards (Higher Education Standards) and institutional compacts.
- What is proposed:
 - Will add unnecessary and unhelpful compliance and reporting obligations.
 - May deter higher education providers from enrolling students that require more support or assistance. This is likely to adversely affect enrolment of students from equity groups and that will disincentivise the pursuit of parity.
 - Runs counter to the underlying policy objectives the Commonwealth claims to promote.
 - Does not appear to understand the sector as a mass system, the heart of the transformation of higher education in Australia since the Dawkins reforms, and particular the advent of demand.
 - Does not consider students as autonomous adult learners and reduces their agency.

Deakin University specific responses to consultation questions

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

The Higher Education Standards Framework (Threshold Standards) provides sufficient guidance to the sector, noting that the National Code responds to different policy challenges associated with international education.

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

The National Code and Higher Education Standards Framework already work together effectively and contribute to a vibrant international education sector that underpins and compensates for persistent underfunding of domestic cohorts.

Based on the table below, though readily acknowledging issues in the sector of a failure to adequately support students, we would once again highlight the importance of accountability, and bringing nuance to address those not meeting their requirements or acting in poor faith, rather than excessive, all-institutions red tape.

| Proposed Guidelines | Deakin relevance |
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| <p>Policy</p> <p>The Department proposes that the Guidelines will prescribe the following information to be included in the Support for students policy, noting that this list is not exhaustive. The policy must include:</p> | <p>Deakin already has a range of policies, procedures, strategies and plans focused on support for students. The embedded nature of Deakin’s approach will necessitate if these guidelines are passed, not just writing a Support for students policy, but reworking an entire student support policy architecture.</p> <p>This is unnecessary and will divert resources from the very things the Commonwealth wants to pursue.</p> |
| <p>Support for individuals</p> <ul style="list-style-type: none"> • how the higher education provider will assess academic and non-academic suitability for continuing study, especially for students who have already triggered alerts | <p>Deakin already has mechanisms in place to monitor progress and address poor progress, provide additional support, and actively manage non-participating enrolments.</p> |
| <ul style="list-style-type: none"> • processes that identify students who are at risk of not successfully completing units of study | <p>Deakin already has mechanisms in place to monitor levels of engagement in units including pro-active and pre-census to cancel enrolment for genuine non-participating students.</p> |
| <ul style="list-style-type: none"> • processes to ensure that students are connected to support, and that non-engagement with support triggers escalations before the census date wherever possible | <p>Deakin has systems in place for non-participating enrolments. Deakin courses and units are designed to prompt student engagement and active participation including pre-census formative assessment and feedback.</p> <p>There are significant risks to the University if we are required to run a variation of academic progress within units rather than once a unit is completed</p> |
| <ul style="list-style-type: none"> • arrangements to provide non-academic supports for students, such as financial assistance, housing information and mental health supports – this is particularly important as many students struggle due to non-academic issues | <p>Deakin has well-functioning student services spanning the range of issues mentioned.</p> <p>There are significant risks to the University/sector if penalties are applied to student success/failure for matters relating to non-academic issues. While the guidance suggests penalties will only apply if policies have not been adhered to, the content of these guidelines could encourage vexatious complainants and is likely to cause further confusion. Additionally, this issue points to the conflict</p> |

| Proposed Guidelines | Deakin relevance |
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| | between government drive regarding student support and current funding system based on volume, not breadth of mission. |
| <ul style="list-style-type: none"> how the higher education provider will provide access to targeted individual literacy, numeracy and other academic supports as required | <p>Deakin has just had an independent review of academic and peer support services which, in an overall favourable report, recommends a few adjustments, mostly to the timing of programs.</p> <p>There are significant risks to the University/sector on the expectations of targeted support – is a generic study skills session sufficient, or are individual diagnostic assessments expected?</p> |
| <ul style="list-style-type: none"> a list of circumstances resulting in proactive offers of ‘special consideration’ and academic adjustment arrangements for students who have experienced or been affected by a significant life event | <p>This is not workable. Proactive special consideration would still require students to notify the university to verify claims.</p> <p>Deakin provides individualised consideration of requests for adjustments to assessment and access plans. While Deakin provides guidelines to staff and students, we note many students have complex, multi-factorial needs. Appropriate adjustment also varies with the nature of the learning and assessment – especially for experiential and work-based learning.</p> |
| <ul style="list-style-type: none"> innovative provider-driven and evidence-based additional supports such as peer support | Business and usual at Deakin. |
| <ul style="list-style-type: none"> targeted in-course support from academic staff such as check-ins, and flexibility on assessment arrangements | <p>University students are autonomous adult learners and the evidence is they ask for help when they need it.</p> <p>Some flexibility in assessment arrangements is available to students who need it but as a principle it is inequitable to students, unworkable for staff and may have implications for academic integrity.</p> |
| <ul style="list-style-type: none"> appropriate crisis and critical harm response arrangements for students. | Deakin already has this in place, but this opens big questions around where responsibilities begin and end for the University and broader community supports. |
| Institutional Level Requirements | |
| <ul style="list-style-type: none"> requirements to ensure that academic and non-academic supports are age and culturally appropriate, including specific arrangements for First Nations students | Deakin provides tailored support to Indigenous students on-demand. Deakin promotes culturally inclusive and accessible practice throughout. What standards will be applied to judge cultural appropriateness and how will exemptions be applied where the nature of the academic work/study may demand examination of a broad range of materials? |
| <ul style="list-style-type: none"> assurance mechanisms to ensure that the specified policy is faithfully and fairly implemented and that errors, outliers and opportunities for improvement are identified and escalated | <p>Governance standards including policy provision, compliance and oversight are intrinsic to the Higher Education Standards and are definitional for self-accrediting institutions. Assurance of adequate governance is already and appropriately regulated by TEQSA.</p> <p>Additional assurance mechanisms are redundant and likely to be confusing.</p> |

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| <ul style="list-style-type: none"> that sufficient resourcing is available to adequately support all students identified as requiring additional assistance, including how those resources are adjusted to meet demand | <p>The potential demand for support services is infinite. How sufficient is sufficient?</p> <p>Resourcing should be tailored to support individuals to a reasonable extent that allows students to reach required levels of achievement.</p> |
| <ul style="list-style-type: none"> there is access to trained academic development advisors who specialise in identifying the reasons why students struggle and assembling the right response for individual students. | <p>Creation of an effective and supportive environment is intrinsically very complex with complexity increasing with the diversity of students. Provision of support for teaching teams must be adapted to the mission and organisation of each institution. It is not appropriate to micro-manage educational provision.</p> <p>Deakin provides expert curriculum design support for its teaching teams and addresses student success as a whole-of-institution goal.</p> |
| <p>The Guidelines would also prescribe that a <i>Support for students policy</i> must:</p> <ul style="list-style-type: none"> be publicly available on the higher education provider’s website, with support options widely communicated to students | <p>Deakin policies are publicly available.</p> <p>Deakin uses multiple interconnecting strategies and a suite of aligned policy settings to support students and their success.</p> <p>Disrupting existing policy and process to create a new separate policy will create confusion, delay action and disrupt existing support structures.</p> <p>We strongly advise against micro-management of individual policies.</p> |
| <ul style="list-style-type: none"> be updated on an annual basis | <p>As required by the Higher Education Standards, all Deakin policy is regularly reviewed and updated. Policy is also amended as required by changes in circumstances. Good policy should not require annual change.</p> |

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

The Guidelines provide unnecessary and unworkable detail and should be redesigned. There is no case for more micro-management. The Commonwealth is encouraged to consider how TEQSA might engage further with matters of student equity and support within the existing Higher Education Standards Framework and its regulation, noting that most universities in the sector are due for renewal of registration in 2024 to 2026.

Deakin notes that student diversity and equity standards have never been explicitly part of the core evidentiary requirement set in re-registration. It seems there is perhaps more to be gained by using the policy instruments already at the Commonwealth’s disposal rather than establishing an entirely new standards and compliance framework as the Guidelines propose.

HESF Threshold Standards could be enhanced to ensure more comprehensive student support without imposing a policy which may duplicate and over-engineer existing practice.

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

See comments on question 3. Deakin recommends a more programmatic approach:

- Providers should have mechanisms in place consistent with relevant Higher Education Standards to ensure students have appropriate academic and non-academic support, noting that students in higher education must be responsible for their own learning.

- TEQSA is encouraged to pay closer attention to relevant Higher Education Standards to ensure that institutions have appropriate academic and non-academic support.
- HESF Threshold Standards could be enhanced if necessary to ensure more comprehensive student support without imposing a policy which may duplicate and over-engineer existing practice.
- Many requirements proposed are already in place at Deakin in other policies, procedures and practices. For others, implementation will be impractical at scale (e.g. ‘targeted in-course support from academic staff such as check-ins’/ ‘proactive offers of special consideration’).
- The success of the above may be accounted for with Government via consideration of outcomes-based measures of student success. This informs accountability approaches, while preserving institutional nuance to serve specific student cohorts.

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?

Deakin recommends to the Department a recent open access text on inclusive education written by leading higher education researchers:

[Ajjawi, R., Tai, J., Boud, D., & Jorre de St Jorre, T. \(2023\). *Assessment for inclusion in higher education: promoting equity and social justice in assessment* \(p. 260\). Taylor & Francis.](#)

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

TEQSA undertakes an annual risk assessment of all providers. Deakin recommends that this mechanism be refined to pay closer attention to matters of student equity rather than establishing an additional twice-yearly detailed report.

Deakin already reports data to the Department via TCSI on a rolling basis and other matters on a cyclical basis. Much of the data proposed in the guidelines is given to the Department already (e.g. HELP costs for students who fail, HEPPP reports). There is no need to provide additional data beyond that already provided.

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?

No, no additional information should be reported. The guidelines should not be progressed as proposed.

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

The Guidelines if implemented are not workable. The compliance requirements, and threat of financial penalty may be a stick that is rarely, if ever, utilised. However, the threat does send the signal that students that need additional support are a much higher risk to the institution and therefore less desirable. Perversely, penalties may prompt more conservative enrolment and further reduction in diversity and equity students.

Deakin is also concerned about the signal that penalties would send to students. It is likely that at the very least that vexatious complainants would see such a policy as a means of entering into a series of perpetual grievances (support not targeted enough, check-ins by professional rather than academic staff, etc). The extent to which students would see they have a free pass to get a pass with the highest level of support or their money back is a huge system-wide risk with such a policy requirement.

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

The guidelines should not be implemented. Responses to questions 4 and 6 are particularly relevant.

10. Specific comments regarding student and campus safety.

Deakin agrees with the Government that a student’s safety on campus is directly related to student success. Our campuses must be safe environments for all members of our communities to pursue their academic life. Deakin has been at the forefront of developing, implementing, and championing programs and measures to enhance campus safety. These issues

have been prioritised across all areas of the university, from our Council and executive team through to all our academic and professional staff. We take this task very seriously and will continue to seek to innovate, implement evidence informed measures and work with external partners to affect positive change.

Most of all, Deakin's approach is informed by the advice of our specialist team and experts within the space. This includes leading challenging conversations and adapting our approach to the best evidence. We know from this that our programs can be effective and have a meaningful impact, but also that it is an issue beyond the scope of a single institution, or indeed our sector as a whole. Those experts tell us that effecting real change means tackling these horrid issues not merely as they present, but at the root. True behavioural change is difficult, and any approach ignoring such a reality is unlikely to be effective. Our young people need to be educated in school years about respect and consent.

By the time a student arrives at Deakin, or any university, they are adults, and behaviour change programs have some success but not for every cohort. This is what our experts tell us, we should listen to them, and will continue to work with all partners who share this outlook to seek meaningful advancements.