

Support for Students Policy Guidelines Consultation Paper



September 2023

The University of Newcastle welcomes the opportunity to provide a submission to the Department of Education's *Support for students policy Guidelines consultation paper*.

Students should be provided a wide range of supports to give them the best possible opportunities to succeed at university. Like most universities, the University of Newcastle has a range of supports in place to achieve this—and to meet the prospective requirements of the Higher Education Provider Guidelines. Any additional measures should be achievable, avoid duplication, and should be evaluated against real outcomes for students.

Proposed Legislative Changes

The goal of any changes must remain improved outcomes for students, and ensuring that limited resources are directed towards increased student support rather than administration.

It should be acknowledged that the evidence, sufficiency, and effectiveness of student success policies are already tested through compliance—and demonstrated compliance—with the *Higher Education Standards Framework (Threshold Standards) 2021*¹ (the HES Framework) and the *National Code of Practice for Providers of Education and Training to Overseas Students 2018*² (the National Code).

Demonstrated compliance and assurance against the HES Framework and National Code is required by each provider³ to maintain registration.⁴ Further requirements within the Guidelines risk duplicating regulation and may place additional and onerous administrative burden on universities.

It is important to recognise that most institutions – the University of Newcastle included – have a range of interrelated policies, rather than a single policy, to ensure students are adequately supported throughout university. Where an existing policy framework, rather than an individual policy, complies with the legislative intent, this should be sufficient to meet Guideline requirements.

Student Support Measures

The University strongly supports the Universities Accord Panel finding that supporting students to succeed at university is essential to widening participation and access. Consistent with this, we support the aims of the Bill to ensure students are properly supported to study and to pass.

¹ Enabled by the *Tertiary Education Quality and Standards Agency Act 2011*

² Enabled by the *Education Services for Overseas Students Act 2000*

³ HES Framework s 6.2

⁴ TEQSA Core-plus mode for regulatory assessment policy

The University welcomes the Higher Education Standards Panel review of the HES Framework, with a view to ensuring alignment between the Guidelines, HES Framework and National Code, and improving the Framework and its implementation.

Consultation Questions:

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

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

As outlined by the Department (and elsewhere within this submission) the proposed expansion of the Guidelines builds on the regulatory and compliance requirements of the HES Framework and National Code. It is important to recognise these legislative instruments are not just threshold standards, but are foundations to ensure education quality, student rights, transparency and accountability, and consistency and confidence across the sector.

The National Code is closely aligned with the HES Framework by referencing many of its standards and elements. This alignment ensures that international students receive a comparable quality of education and support to domestic students. For example the National Code:

- refers to the HES Framework’s academic standards, ensuring that international students are taught in accordance with the same academic quality expected of domestic students, and
- incorporates elements of the HES Framework related to admission, information provision, and student support, which are critical for international students.

Similarly, the HES Framework includes standards and elements related to the support and welfare of international students (i.e. *inter alia* setting standards for admission processes, academic support, and the provision of information to students, which are relevant to both domestic and international students).

Consequently, while they serve distinct purposes, the HES Framework and National Code are aligned and support each other to ensure the quality of education for both domestic and international students. This dual approach to creating and supporting a high-quality education environment for all students is already supported within the policy landscape of the Sector.

Therefore, a residual consultation question emerges—to what extent will the Guidelines require compliance reporting against the HES Framework Threshold Standards and the National Code?

This matter, as considered in various other submissions to the Senate Inquiry into the *Higher Education Support Amendment (Response to the Australian Universities Accord Interim Report)* Bill 2023, highlights that the amendments at section 19-43 risk duplicating existing regimes and must be balanced. The University of Newcastle supports the Australian Technology Network of Universities (ATN) contention that moving regulatory responsibility from TEQSA to the Department of Education, and creating parallel reporting and compliance obligations, has the potential to create waste and inefficiency in the sector.

Are the proposed individual student and institutional level requirements practical, and implementable?

The proposed policy requirements outlined within the Consultation Paper combine a variety of individual supports and institutional requirements to not only support students but further direct institutional compliance reporting (against a number of existing arrangements) in a codified fashion. The University reaffirms that while it supports the intent of amendments in Part 2 of the Amendment Bill requiring universities to have a comply with a single student support policy, this may negatively lead to establishing parallel reporting and compliance obligations requiring a redirection of already scarce resources towards compliance and reporting.

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?

As outlined above, there is a significant risk of potential duplication, resource strain, and administrative burdens that these requirements may introduce. While annual reporting to TEQSA is not required against compliance with the HES Framework and National Code, internal compliance and assurance *is* required by TEQSA as a self-accrediting university. Streamlined reporting or high-level analysis would be sufficient in-line with TEQSA's risk-based regulatory approach.

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

The University understands it is the Department's expectation that providers will be required to meet the requirements of revised Guidelines by the commencement of the 2024 academic year. Quality providers will fulfill existing requirements under law and meet community and student expectations by already having policies in place to support students to succeed, which therefore leaves the broader issue of collating and reporting this information for the Department and Minister. Broader discussion with the sector indicates a staged approach to implementation would be best to support quality reporting outcomes.

However, we agree that a one-size-fits-all approach would not be sufficient to enable efficient reporting and again supports streamlined reporting or high-level analysis in-line with TEQSA's risk-based regulatory approach.

Other practical considerations include ensuring compliance is focused on student success, rather than mandating monitoring at a unit level. Many universities will have in place systems that monitor student progress as a whole, but may not be easily or quickly adapted to apply to each individual unit of study. If these requirements are implemented, some universities may either need additional resources, or would need to divert resources to achieve this within the timeframe.

The Department's Consultation Paper notes that *"providers should, as a minimum, develop and apply student entry procedures appropriate to their mission, context and cohort."* The Department further outlines that *"it should also be standard practice to identify, protect and provide support for vulnerable students and students at risk of failing."* Both these requirements are already included in the HES Framework and the National Code.

Consistently, the University has publicly documented Admission Procedures and an Academic Credit Policy alongside Student Academic Progress Policy and Procedures. Beyond the minimum set out by the Department, the University highlights its vision, purpose, and commitment within our Strategic Plan,⁵ *'Looking Ahead 2020-2025'*, which commits to delivering an outstanding and inspiring student experience ensuring that our students develop life and career skills, and are strongly supported in their physical and mental wellbeing.

Conclusion

The University welcomes changes to the Higher Education Support Act 2003 that would contribute to widening participation in higher education, and stands ready to work with the Government and Department on reasonable policy changes that would help improve outcomes for students. These should be allied with the principles of proportionate, risk-based regulation, and calibrated against existing mechanisms in preference to the creation of a new suite of reporting and compliance obligations.

⁵ <https://www.newcastle.edu.au/our-uni/strategic-plan>