About the author:

Angela is a preeminent expert in the student success domain, specifically whole-of-organisation learner-centred strategy and operationalisation, with a focus on data-informed actions. Angela has held Principal Advisor roles at Te Herenga Waka Victoria University of Wellington, and New Zealand's Tertiary Education Commission (TEC), sits on the leadership team of Tītoko – Te Herenga Waka Victoria of University's, Centre for Student Success, and consults in the tertiary education sector.

Angela has a background in economics, coupled with 9 years at Te Herenga Waka, 6 years in analytical and management roles at the New Zealand and United Kingdom national statistics offices. Angela's doctoral study, under the auspices of Te Pūnaha Matatini Centre of Research Excellence, investigates education institution data as a source of sustainable competitive advantage.

Angela has architected a sector-leading framework for whole-of-institution, learner-centred, sustainable learner support.

Recent presentations by Angela:

- ANZ Heads of Student Administration annual conference. Awarded a Russell Hillbrich Scholarship to attend and present. "The Journey to Paerangi". Perth, Australia, August 2023.

- ANZ Heads of Student Administration Webinar (invitation to give a dedicated webinar). "Ímplementing a whole-of-organisation learner success approach". April 2023.

  Link to presentation:

  https://us02web.zoom.us/rec/share/6TfDHtIRV4xZwlGJyMBVajbpbNyb206CKFzK6EJlMf1CFEb6Q0gnlUXC8SV
  Wk5NE.9Qzd24MgmC06edKg
  Passcode: c@.sgu5H

- ANZSSA Understanding the Student Journey Symposium, "Paerangi, Analytics, and Holistic Learner Support". Noosa Heads, Australia October 2022.

- New Zealand Association for Research in Education, Annual Conference. "Tertiary student success innovation through the triple helix: The development of a whole-of-institution framework for learner success". September 2022.

- NZ Tertiary Sector Community of Practice, "The Journey to Paerangi". November 2022.

- Tūwhitia Student Success Symposium. "Hanga i te whare. Whole of institution transformation built upon enabling foundations". University of Canterbury, New Zealand, September 2022.

This submission responds to the following questions:

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

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?

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

8. What needs to be considered in the Department's approach to non-compliance?

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

Feedback to questions:

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

The measures of success that institutions are required to report on must reflect the appropriate circumstances of the cohort of learners.

In Aotearoa, tertiary institutions are incentivised through participation, retention and qualification completion, however, these measures do not work for all learners and can lead to perverse outcomes.

I am pleased that the new Australian policy notes progress as a measure of interest. Progress is a more appropriate measure of success than retention. Retention can lead to perverse outcomes for learners, such as excessive financial and temporal burden.

For many learners, and indigenous learners in particular, qualification completion may not be the end goal. Our operational research has revealed that learners themselves define success as attaining a job; having a career; and building professional networks.

In Aotearoa, tauira (students) Māori who commence tertiary study are often approached by employers because they have already shown themselves to be high achieving students through participation in higher education. In some cases, tauira Māori attend university to gain specific skills. In these cases, qualification completion is not a helpful measure of success.

A more appropriate measure of success in these instances is time to accumulate credit points.

Time to accumulate credit points provides for the accumulation of credit points within a period of time, and with consideration for attempted credit points.

Time to accumulate credit points is an appropriate complement to qualification completion for the wider student body.

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?

The whole-of-institution learner success framework that I have architected provides an excellent structure within which institutions may place their own specific circumstances.

The framework works on a loss / momentum strategy through the phases of connection, entry, progress, and completion, and is adaptable to the individual context of each education organisation.

The Framework takes a transformational lens and is activated through a suite of initiatives from across the institution that connect together in a learner-centred co-ordinated approach - no initiative occurs in isolation. The Framework features a strong focus on surfacing information

and data to support the decision making of both learners and staff – with an emphasis on proactive action, rather than reactive. The holistic nature of the Framework responds strongly to pastoral care regulatory environment.

And in order to do that, the Framework is built upon enabling foundations – people, policy, data, and technology which provide the environment for initiatives to be coordinated through the academic and non-academic spheres.

For example, intake information and analytics prior to the learner's first week of study is used to identify learners at risk of not passing the coming trimester. Learners are placed into a care pathway with a level and intensity of personalised support that meets them where they are. During the trimester, risk adjusted engagement analytics guide proactive outreach to learners who are at risk of not passing their courses.

The Framework has been developed over 3 years of operational research through:
- A stocktake of retention-related activity accompanying staff interviews
- Interrogation of institutional data
- Students interviewing students, to understand what success means to learners
- Student and staff journey workshops
- Piloting
- Best practice in the global student success movement, literature and resources.

New Zealand's Tertiary Education Commission (TEC) has lauded the Framework, as sector-leading and a comprehensive strategic and operational framing they have not seen elsewhere in the world.

Subsequently, the TEC recruited me to develop a suite of resources to help aid sector maturity in whole-of-institution transformation. The resources are found on the TEC's website here:

https://www.tec.govt.nz/oritetanga-learner-success/new-oritetanga-tertiary-success-for-everyone/learner-success-framework/preparing-for-success/

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

6.a.
In order for specific cohorts of learners to be supported, it is necessary for those cohorts to be defined, monitored, and reported. Any specific cohorts of interest should be specifically identified in the policy and guidelines.

6.b.
Recently in New Zealand, the TEC has requested tertiary education providers to explain their approach to supporting students to succeed, as part of their institution's investment plan. The TECs approach has been met with some resistance from education providers, primarily due to the early stages of maturity in the sector's understanding of the opportunities afforded in modern learning environments in order to support transformational learner success support.

At the moment, in New Zealand, there are no fiscal penalties attached to this compliance exercise.

This light touch approach has resulted in institutions identifying a flurry of individual initiatives to support learner success, rather than meaningful systemic impactful transformation. Additionally, without a structured reporting framework, it is unclear what the national goals are and how to measure progress toward them.

Without a national policy, it is up to the individual institutions to prioritise learner success outcomes.

In New Zealand, students must pass more than half of their courses in order to retain government StudyLink funding. In order to align with this government requirement, Te Herenga Waka Victoria University of Wellington has adopted a university policy whereby students who fail more than half their courses are placed under academic progress management. The university's Procedures for Continued Enrolment policy contains the requirements of Australia's proposed Support for Students Policy. In this respect the institution's policy explains how the institution will seek early identification of students at risk of not succeeding, and programmes of support, but also places academic and engagement requirements on learners to ensure their participation in their own education journey. This approach promotes learner agency, for which we use the te reo Māori term "rangatiratanga", which relates to self-determination.

The implementation in Australia, of the new policy and guidelines, provides an ideal opportunity for the rollout of an exemplar whole-of-institution learner success and reporting framework, such as that which I have architected. My communications with Australian higher education providers has revealed nervousness in their understanding of how their institutions should respond to the policy. A learner success and reporting framework will help expedite the effectiveness of institutions' transformational efforts, their implementation of the policy, as well as establishing meaningful reporting metrics.

The piloting of the Framework within the specific context of the policy implementation would provide valuable insights to incorporate into future iterations of the Support for Students Policy and its Guidelines.

8. What needs to be considered in the Department's approach to non-compliance?

It is important to be aware that supporting at risk learners can take extra resource above and beyond the current capacity. Typically, learner support is utilised by students who have an inherent propensity to engage in their studies – and has not necessarily been benefiting the students who most need it, especially those who become unengaged. It is important that the compliance model takes into account the costs associated with more intensive support.

Setting institutions up with enabling foundations within the context of a whole-of-institution framework for learner success and reporting, will place the sector in an excellent position to see large-scale adoption of the requirements of the new policy.

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

9.a.
A well founded systemic response requires time to implement the foundations and initiatives.

9.b.
Given that all providers must adopt the guidelines, efficiencies can be gained by providing federal expertise to institutions to aid their implementation planning and delivery. This expertise can occur in the form of a learner-centred framework and reporting model.

An exemplar of this is seen through the model adopted by the Achieving the Dream (ATD) organisation in the USA. ATD provides expert guidance through a partnership (mentoring) programme with over 300 community colleges, to promote positive change, close achievement gaps, and accelerate student success. Though ATD operates in the private sector, I believe a similar model of support can be adopted at the Federal level for Australian tertiary education providers.

https://achievingthedream.org/

https://achievingthedream.org/our-work/