

THE UNIVERSITY OF NOTREDAME AUSTRALIA
Submission to the Department of Education: Student Support Policy Consultation Paper
September 2023

Consultation questions:

1. Are there features of the National Code for overseas students that could be applied to domestic student support and included in the guidelines?

Notwithstanding that some obligations in the National Code are linked to student visa conditions, there are aspects of the current ESOS Act that may be applicable to domestic student support such as, mandatory orientation, ensuring students have access to the information about support services, and use of intervention strategies for students at risk. Use of intervention strategies with domestic students could be a way of ensuring support is provided to vulnerable students in a timely and holistic way.

As a general principle personal and academic support services should be equally available to all students, irrespective of whether they are domestic or overseas students, noting that a range of the student support requirements in the National Code are also presently addressed in the Threshold Standards.

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

These will need to be built into procedures related to student progress and retention strategies that are used by all Universities to track and assist students at risk of failing their degrees.

3. What strategies in the guidelines will ensure support for students to study successfully and that is practical and implementable?

Universities already have strategies that they use to ensure student success. Some of these are the use of peer assisted student support strategies, academic advisors and 24/7 academic skills support. These support mechanisms are usually dependent on the University's context, structures, and available resources. Best practice exemplars, if included in the guidelines, could serve as benchmarks for universities to follow.

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

The proposed requirements are practicable and implementable. However, the current wording appears to be more consistent with process level requirements, whereas a policy would generally be expected to be principles based and provide broad statements of intent.

This is relevant as there are requirements identified for inclusion in a student support policy that are likely to be already covered by providers' existing policies and procedures, such as for example, monitoring academic progress, special consideration, equity and access, curriculum design, learning and assessment, and critical incident management. Specifying the Student Support policy requirements in the Guidelines as broad principles will enable providers to develop a student support

policy and supporting procedures in a way that complements existing policies and procedures and is aligned to their context and their missions.

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?

None available.

6. Given that we have to develop a Support for Students policy based on the criteria already identified, what reporting requirements need to be included to demonstrate compliance with the Support for students policy requirements?

The scope of the reporting requirements proposed for included in the Guidelines are adequate. However, with regard to the frequency of reporting there may be a need for further clarity on what is being proposed.

On page 9 the consultation paper states, 'Higher education providers must prepare a report to the Minister periodically on compliance with their *Support for students' policy*'. Yet the elaboration of more specific requirements to be included in the Guidelines includes 'the frequency of reporting, which could be expected to be periodically, after each census date, twice yearly, annually or at other determined intervals' which suggests multiple reports.

While internal monitoring of ongoing compliance is necessary, reporting to the Minister at each census date or even twice yearly is unlikely to support a meaningful evaluation of the effectiveness of implementation of student support requirements. Providing a report after each census date would not support coverage of the requirements proposed as it would not be informed by data student success / progress rate at subject level. An annual report would provide a more comprehensive evaluation of institutional compliance that is informed by a provider's annual cycle of institutional planning, review and improvement.

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?

Universities already providing reporting in relation to specific student support initiatives and programs, such as the Indigenous Students Support Program, Away From Base, and National Indigenous Australians Agency. Existing reporting channels need to be used effectively wherever possible to avoid duplication of effort and unnecessary regulatory burden.

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

The approach to non-compliance outlined in the discussion paper appears to be consistent with existing HESA requirements. However, the approach for the publishing outcomes of non-compliance isn't entirely clear. The example given is very general and in practice it would be possible for an instance of non-compliance with a Student Support policy to be minor and easily rectified so as to not warrant the publishing of information.

With regard to the publication of student outcome data for all providers it isn't clear in the discussion paper whether this would be based on existing student progress

and completion data submitted by providers. If providers are to anticipate further data requests, further detail on the approach for this would assist in being able to comply with this requirement.

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

The timeframe for implementation of the requirements for a Student Support policy take account of the following points.

- There needs to be adequate time for effective policy development, including ensuring opportunity for consultation with students and staff, governance oversight and planning for implementation. It may not be practical to expect a quick turnaround of a few months.
- Ensuring a sustainable approach to meeting reporting obligations is likely to require providers to further develop data systems and internal reporting functions / processes.
- Implementation of the new requirements will require the allocation of additional funding and human resources.