



September 2023

The University of Southern Queensland (UniSQ) welcomes the attention this Government initiative places on the activities providers currently undertake to support their students in being successful in their higher education studies and future ambitions. However, we have a number of concerns about the underlying assumptions and the mechanism that is being proposed to formalise these activities. Fundamentally, the notion of a Policy appears to be based on an assumption that a Student Support Policy will improve student outcomes. While evidence does exist that shows correlations between support accessed by students and their subsequent 'success', not all students will access support and even if they did, providers would not be able to scale-up required services to the extent needed to meet needs under the current funding arrangements. Further, support is most effective in reaching all students if it is encountered and contextualised within the learning environment and largely integrated and embedded in discipline learning activities with clear signposts to students about how to access support services. We have concerns the paper prescribes what should be associated with these support activities and its level of detail (or lack thereof); the practicalities of its implementation; and the timelines for its introduction and ongoing compliance reporting. We are also concerned about the number of disparate provider support schemes and policy responses that have been built up over time, tailored for provider cohorts, and suggest this may be an opportunity to seek homogenisation of these schemes; As an alternative to the proposed Policy we suggest that each institution be required to have a student success plan or similar with measurable cohort specific targets that is agreed as part of the annual performance agreement or compact process. Such a plan would allow providers to design context-specific nuanced approaches to improving student outcomes and would focus on measuring impact for specific cohorts over the provision of services.

Consultation questions

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

It would be preferable that all Government instruments – the Higher Education Standards Framework, the National Code and the Higher Education Provider Guidelines – were in alignment in their language and expectations in relation to the services and support provided to students. Ideally there would be one point of reference, not multiple, to assist providers in the efficient application of effort to meet their obligations. It would be common practice that support services referenced throughout these instruments are accessible by all cohorts and deliver strategies for the support of students with various and diverse challenges, regardless of whether they are international or domestic. If, presumably, the principles and objectives of these instruments are fundamentally the same then alignment could be achieved and bring greater clarity to the responsibilities of providers.

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

As suggested in response to Question 1, alignment of language, expectation and the range of services and interventions specified across both instruments would allow for a more effective implementation. Development, operation, dissemination of information and monitoring would be more efficient and easier to navigate for students. For example, effective compliance with the Support for Students Policy would also meet compliance obligations under Standard 6 of the National Code. Assurance could be met through a single exercise.

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

The current detail proposed lends itself to be described as either too much or insufficient. The expression and specificity of the proposed inclusions give cause for concern in that it generates further questions about detail, about intent and about expected provider responses. The circumstances, backgrounds, preparedness, skill level, previous educational experiences and academic capabilities vary greatly between students. This variation is not captured in the ATAR. Consequently, each student has unique needs which vary over time and with new challenges. Their background circumstances and new issues combine within the learning environment to present different challenges for each student. Leading to questions such as what special considerations are adequate? What life-events need to be accommodated given the unique circumstances and responses of every student? Noting that a University's culture and mission will inform its approach, curriculum design, learning and teaching and assessment act as the transformation engine in which student learning engagement is fostered¹ We ask what will be seen as sufficiently 'pro-active' in terms of provider actions, noting that students respond differently and it is often the most well prepared who actively seek out and engage in support offered, while those who are more culturally or socially unfamiliar with higher education, can be reluctant to access support in case it reveals their disadvantaged or equity status. Pro-active support infers use of information/disclosures which may result in privacy breaches and may result in problematising cohorts based on pre-existing demographic characteristics. What if a student divulges something to a provider but not wish that information to be used for any other purpose? What is meant by 'check-ins' from academic staff? Why academic staff in particular, how often must this occur and in what format? Will a provider need to capture 'check-in' data? What does it mean to provide flexibility in assessment? Flexibility in time? In format? Some assessment types and timing cannot be modified. Will that be possible under this obligation?

The requirements are stipulating very specific resource allocation in the form of 'trained academic development advisors' to assemble the 'right response' for individual students. Many students have intersecting needs and challenges that may need a range of professional advice and services. It is often not possible for a single resource to have all of the knowledge and expertise. It is also not clear who determines the response is right? The provider or the student? Or the Commonwealth if the student believes the response is not right and lodges a complaint?

The student support policy if it exists must allow individual providers with the knowledge of their students' needs, to activate responses appropriate to that understanding of their cohort.

The proposed detail does not reference career advice and support. The provision of tailored personalised career development (especially for equity cohorts) is an evidence-based approach underpinning student success and positive graduate employment outcomes. Careers and employability learning, particularly when embedded in curriculum, allows students to reflect on all aspects of their education experience and make sense of those experiences in terms of their future career, to inform career decisions and action plans, strengthening career adaptability and resilience.

While there is provision for 'innovative' practices, providers would see this type of support to be a mainstream activity to support student success.

Reference is made to monitoring complaints from students and others but for this to be meaningful students and others must have easy access to a systematic, fair and timely complaints and grievance process. It is also proposed that the provision of services which appear on page 6, i.e., '...make services available which must include providing access to emergency services, health services, counselling, legal advice, advocacy, accommodation and welfare services' be broadened to also include '...and access to systematic, fair and timely complaints and grievance process.'

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

At UniSQ, student support services (we call this support for learning (SFL)) are attuned to the needs of our largely non-traditional cohort. We are in the midst of transforming the provision of SFL from a largely reactive model to model of provision that is scalable and largely embedded in curricular and co-curricular activities. Our SFL activities will be largely proactive, while we maintain responses services across all support areas. This transformation is about broadening the reach of SFL to all students, not just those that are visible or ask for assistance. We are not convinced that a Policy is the right instrument to improve the provision of SFL or the uptake of student support by students. With this context

¹ See Ella R. Kahu & Karen Nelson (2018) Student engagement in the educational interface: understanding the mechanisms of student success, Higher Education Research & Development, 37:1, 58-71, DOI: [10.1080/07294360.2017.1344197](https://doi.org/10.1080/07294360.2017.1344197)



in mind, we find significant issues with the prescriptive nature, language used, and lack of detail of how this is applied in the context of teaching delivery where there is now a great diversity of offerings in the sector. For example:

The list of 'Support for Individuals' and 'Institutional Level Requirements' are largely deficit driven. It would be preferable to see a greater emphasis on more strengths-based requirements (e.g., How the university will provide students a voice; how cohorts like elite athletes will be supported; how progression and achievement will be recognised and rewarded). This could be achieved through a plan with measurable targets rather than a policy.

The need to assess 'non-academic suitability' is of concern in defining what this means. Does this create a risk in treating attributes like mental health or disability as reductive; or establishing unnecessarily invasive processes by the provider?

How is the sufficiency of resourcing determined? What are the acceptable levels and wait-times for support to meet the threshold of adequacy? What is sufficient for one student may not be for another. How is this to be contextualised for individual students undertaking their studies in various modalities and with various durations of study? How will institutions be supported to scale up provision in order for services to be sufficient? This could be, on face-value, a very subjective assessment.

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?

Examples of best practice case studies can be found via the [Student Success Journal](#) and [JANZSSA](#). The Annual Conferences associated with these two Journals are collegial opportunities which are very well supported by the sector because they focus on the open sharing of best practice. For example, in the post-conference evaluation survey from the 2023 [STARS](#) Conference; more than 95% of delegates who responded to the survey (more than 40% response rate) said that they had learned something at the Conference they would apply in their institution and reported that the Conference was assisting the sector in improving student outcomes.

We suggest that a viable alternative to the proposed Policy would be to revisit an earlier Government initiative for each University to have a Student Success and Retention Plan (or similar) with actions and associated measures and targets for assessing progress for specific cohorts. The Plan could be agreed as part of the annual Compact or Performance Agreement Process. This plan would allow providers to design initiatives suitable for their cohorts while providing transparency for reporting purposes.

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

Reporting against a Policy or Plan would require both qualitative and quantitative formats which would need a new, standalone reporting response to the Commonwealth. It would be preferable therefore that it was an annual statement to the Minister. After each census date would be extremely problematic as current provider delivery of teaching may involve upwards of 20 census dates a year. If there was alignment to ESOS obligations, compliance reporting could also be periodically provided alongside providers' external ESOS audits. There is also likely to be challenges around the reporting of 'identified' students as maturity in the capture and reporting of attributes such as low socio-economic status and first-in-family is low. The reporting also makes some assumptions around organisational structures i.e., faculties which are not applicable to all providers.

Providers have a number of processes, tools, systems, and initiatives in place that already support students, but they are not necessarily joined up and automated to optimise intervention, follow-up and reporting, and this will take time to develop.

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?

It would appear to replicate some reporting occurring through other mechanisms e.g., TCSI such as academic outcomes and HELP expenditure. Alignment with existing reporting and data capture would be preferable so as not to duplicate effort.



The information requested seems to be based on institutional definitions of student success (pass/fail), not on an individual student's definition of what success means for them. We need to establish opportunities for providers to demonstrate effectiveness in supporting students to be resilient as the data requirements listed here will not reflect the challenges (and successes) of some demographic profiles. There will need to be a contextualisation mechanism built into the reporting. It could also be helpful to include qualitative reporting on how satisfied students are with the support they have received.

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

While it is understood that much of what is described here in terms of non-compliance are powers already available under the Act, we are mindful that a trigger for action is needed through either the Department's active monitoring of compliance, or through reports to the Department. Reports to the Department necessarily require promotion of the ability to make such a report about a provider and will create another avenue of external review alongside ombudspersons, TEQSA, and Human Rights Commission. Will providers have the opportunity to review and consider any concerns before the Department investigates, i.e., that an internal process must be undertaken first?

It also raises the prospect of publication of findings of non-compliance and reasoning. This would create another source of disconnected information in relation to the application of this policy from, for example, the TEQSA Register of Providers. The publishing of student outcome data for all higher education providers has the potential for the creation of league tables etc and is open to misinterpretation if it isn't contextualised with the range of socio-economic factors that impact on learning.

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

Much of the substance of what is being suggested for the Support for Students Policy exists in some form already at most providers, and the expected content in a single policy statement is exceptionally broad. Most providers will have policy and procedure statements that would capture the proposed content across academic progression, assessment, critical incident management, special consideration, academic and non-academic support services, and assurance and grievance management processes. Capturing what is being proposed in a single policy response would either create a dense and inaccessible policy document for students, or alternatively one that is so high level as to render it meaningless other than to meet compliance, and reliant on multiple subsidiary policy and procedure statements that detail the mechanics of provider intent, actions and processes. Some of what is proposed for inclusion, while actioned or provided by providers in some form, does not necessarily lend itself to being codified in policy – for example in class check-ins will vary according to cohort size, discipline, mode of delivery, duration of course etc. A Student Success Plan could be co-created by institutions in conjunction with their student representative body at each institution. This process and the resulting artefact would serve as useful communication devices in raising awareness of services as well as providing students with agency in determining how and what outcomes are desirable and how these will be achieved through various services.

In contrast, considerable resources would need to be dedicated to create a Student Support Policy and the impact of which we believe is far from certain. Providers will need to consult widely and undertake policy development and diligence through its normal governance processes. In many cases providers will need to reframe multiple existing policy and procedure statements as a result of this requirement, as well developing new policy positions for inclusion. It is therefore not reasonable to expect these policy statements to be in place at the commencement of 2024, given its now September and providers are already implementing a longstanding pipeline of policy reviews and renewals, as well as other significant undertakings. A transitional period for compliance throughout 2024 with a Policy or Plan would be preferable with reporting of compliance against the Act to commence in 2025.

Other considerations in relation to implementation:

- As much as possible, this new requirement should align with existing reporting and compliance obligations and not standing up a new reporting and compliance regime with different timings for similar but different compliance activities and data sets.



- Some thought be given to the language used in expressing these obligations and providing definitions e.g., what is meant by special consideration? Some providers already have various definitions of what this means, and some providers have no provision for it at all.
- It is important that the realities of contemporary delivery of teaching inform these compliance obligations. Providers now offer very different modes and periods of study. Some intensive periods of delivery will not allow for the same types of interventions and responses as a traditional semester may.
- How will this new obligation interact with other existing mechanisms such as requesting removal of financial liability due to special circumstances?
- As well as stipulating support for students, it is important to also stipulate the obligations of students as adult and independent learners who make their own decisions and have their own agency.
- It would be important to understand what 'success' is. Is it simply passing a unit of study? For many students this would not be their only definition of success. Setting expectations as to what is meant to be achieved through a Support for Students Policy will be very important.

