



## Support for Students Policy – Consultation Paper

The University of Queensland (UQ) welcomes the abolishment of the 50% Pass Rule introduced as part of the JRG package and commends the policy objective of ensuring students are supported to successfully complete the units of study in which they enrol. However, we are concerned that the approach taken to implement a Support for Students policy requires rapid and costly revision of our existing suite, imposes additional and significant costs of administration and reporting, is awaiting an evidence basis, and does not nuance different practice nor student academic outcomes across institutions.

### Lack of evidence base

The Consultation Paper notes the Minister has requested that the Higher Education Standards Panel consider whether findings from their 2018 report *Improving Retention, Completion and Success in Higher Education* have been implemented and whether they have been successful, implying that an evidence basis is still being developed. We are not aware any alternative policy options have been considered nor of the evidence basis that Government has considered to ensure the proposed approach will most cost-effectively meet the policy objective and directly support tertiary students.

### Onerous administrative and reporting requirements

UQ has well-established processes for assessing suitability for continuing study within the [Enrolment Policy](#), for seeking reasonable adjustments to courses in the [Reasonable Adjustments – Students Policy](#), and for seeking extensions to assessment within the [Assessment Policy](#).

The development of a new Support for Students Policy will require considerable work effort by institutions to either duplicate existing policy or substantially revise existing policy architecture. For example, the Consultation Paper lists a range of specified supports that must be incorporated in the new policy including assessments of suitability for continuing study, academic adjustment arrangements, and flexibility on assessment arrangements.

Implementing the requirement of a specific Support for Students policy without simply duplicating provisions of existing policy and procedure would require that many relevant policies be revised. This is a significant undertaking, especially at short notice, and may require fundamental revisions to each institution's existing policy architecture.

The prescriptive nature of the proposal, including the extensive reporting requirements, will also require costly system development, an overhaul of business processes, and potentially the centralisation of support across disciplinary cohorts. This approach undermines accepted best practice in which many academic supports are delivered at the local level in the disciplinary context. The costs associated with meeting each institution's new compliance obligations will also necessarily divert resources away from the actual delivery of support to students.

### Institutional autonomy and risk profiles

It is noted that the risk profiles of institutions varies widely across Australia. As drafted, the proposal fails to account for this variation which is impacted by cohort demographics, admission requirements, student retention rates, geographic context, financial viability and financial sustainability.

Further, UQ notes that the objects clause of the *Higher Education Support Act 2003* recognises that universities are autonomous and independent institutions while the regulatory principles set out in the *Tertiary Education Quality and Standards Agency Act 2011* are of regulatory necessity, reflecting risk, and



proportionate regulation. The proposal to prescribe the forms that student support must take and impose onerous reporting obligations is at odds with these objects and principles.

### Implementation Timeframe

The implementation timeframe proposed in the Consultation Paper is also concerning. While institutions, including The University of Queensland, do have processes in place for:

- identifying students at risk, and
- Support for all students,

changes will be required to policy, processes, and systems to comply with the proposed prescriptive approach. The Consultation Paper notes that institutions will be expected to meet the requirements of the Guidelines by the start of the 2024 academic year however given the report of the Senate Education and Employment Legislation Committee is not due until 13 September 2023 it is unclear when the *Higher Education Support Amendment (Response to the Australian Universities Accord Interim Report) Bill 2023* will be finalised and passed.

It is recommended that the government allow at least 12 months for institutions to reasonably adopt all prescribed requirements, including the substantial policy and system changes required, from the time that the Bill is finalised and passed.

### Alternative approach

An alternative approach is for Government to instead prescribe high level performance targets and measure student outcomes (e.g. failure rates and retention rates by cohort and demographic). Measuring academic outcomes and HELP expenditure of cohorts is already possible through the Tertiary Collection of Student Information (TCSI) and this approach can be extended to enable institutions to continue to deliver support to students that best meets needs in the relevant institutional and disciplinary context.

UQ collaborates with students to develop and continuously improve student support, seeking to incorporate the student voice and co-create with students whenever possible. The proposed alternative approach will maintain this collaboration, ensuring supports continue to meet student needs in their institutional and disciplinary context, inclusive of our diverse community.