

8 September 2023

Mr Ben Rimmer  
Deputy Secretary  
Higher Education, Research and International  
Australian Government Department of Education  
Parliament House  
Canberra ACT 2600

Dear Deputy Secretary

**Re: Support for Students Policy Consultation Paper**

The New South Wales Vice-Chancellor's Committee (NSWVCC) recently discussed the Consultation Paper on *Support for Students Policy*.

The NSWVCC is pleased that the Government has supported the Accord Interim Report's recommendation to abolish the 50 per cent pass rule. All NSWVCC institutions strongly support the policy objectives underpinning the *Higher Education Support Amendment (Response to the Australian Universities Accord Interim Report) Bill 2023* and the proposed supporting guidelines. However, there are significant concerns emerging – including: that consultation on the guidelines is occurring after the legislation has been introduced to Parliament; about the proportionality of the proposed mandatory requirements for all providers given their varied risk profiles; duplication with existing requirements under the Threshold Standards and ESOS Act and National Code; timelines for compliance; and the cost of compliance and administration of the proposed new requirements for providers and the Department. We anticipate that individual institutions will detail their concerns in submission in response to the consultation paper by 15 September 2023.

We are confident that these concerns can be effectively resolved if the Government dedicates additional time for stakeholder engagement and consultation and to allow for a thorough evaluation of other potential solutions to achieve the desired outcomes while remaining cost-effective for institutions with varying risk profiles.

The NSWVCC asks that the following matters are taken into consideration:

- NSWVCC institutions are committed to a policy that reinforces our shared commitment to the principles of equity and access, student support and success and associated wellbeing matters.
- Australia's higher education sector operates within a regulatory framework that comprises a comprehensive suite of standards covering provider accountabilities in relation to student support.
- The standards already necessitate the need for providers to identify and monitor at-risk students and to demonstrate support across the student lifecycle to improve progress and success.
- The TEQSA Risk Assessment Framework provides data to enable tracking and monitoring of risk factors including retention, progression, and completion. Advocating for this tool to be

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used more intentionally, supplemented by TCSI data, to ensure that monitoring is based on real-time data rather than lag data is presently the case.

- In addition to the regular provider re-registration oversight of TEQSA, there is provision for TEQSA to monitor provider compliance based on available data. There is also provision for them to conduct thematic reviews as part of their strategic activity. The focus on provider support for students at risk could be prioritised in this way.

In summary, there are several high impact mechanisms already available to the Government to achieve the stated purposes of the student support consultation paper and the associated amendment bill. The Committee recommends that the Government enact only the relevant sections aimed at abolishing the application of the Low Completion Rate measure for Commonwealth-supported students enrolled in public Australian universities. Additionally, we propose the Government refrain from advancing the sections pertaining to the proposed *Support for Students Policy* until it has conducted consultations with stakeholders to understand existing relevant practices and reporting, and to identify and promote instances of best practice as well as ensure that any legislative response is capable of being implemented by all providers cost-effectively and in proportion to the risk profiles.

We appreciate your consideration and look forward to further discussions on this critical matter. Should you require further information, please do not hesitate to contact Ms Catriona Reid, the Executive Officer for the Committee [REDACTED]

Yours sincerely



**Professor Barney Glover AO**  
**Vice-Chancellor, Western Sydney University &**  
**Convener, New South Wales Vice-Chancellors' Committee**

cc NSWVCC members

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Contact: Catriona Reid, Executive Officer [REDACTED]