UTS

Submission in response to the Department of Education's consultation regarding the *Support for Students Policy: Guidelines Consultation Paper*

Introduction

The University of Technology Sydney (UTS) thanks the Department of Education (the Department) for the opportunity to provide feedback regarding the *Support for Students Policy: Guidelines Consultation Paper* which arose in relation to Priority Action 2 of the Australian Universities Accord (AUA) Interim Report.

UTS strongly supports the goal of this policy to ensure that people who gain access to higher education are afforded the best possible chance of success, and we are pleased that the Minister for Education, the Hon. Jason Clare MP, has moved quickly to cease the 50% pass rule in recognition of the disproportionate impact on students from underrepresented backgrounds in higher education.

However, UTS is concerned about the prescriptive nature of the *Support for students policy*. It has the potential to introduce complexity into our existing institutional policy framework and the broader regulatory framework that governs academic quality, ultimately likely to result in a confusing policy environment for students attempting to get help (for whatever purpose) from their university, particularly during the implementation period. In our view the focus should be on addressing systemic barriers for particular cohorts, for example by providing accessible digital and physical environments, to ensure students are not further disadvantaged through policy reforms. Furthermore, universities should retain the institutional autonomy to develop institutional level policies for their specific cohort of students, given the depth of knowledge universities' have about their student population.

This calls for greater consultation with the sector prior to implementation.

The primary purpose of this submission is to inform the Department about the challenges UTS will face should the *Support for students policy* proceed in its proposed form. The challenges and benefits to students are largely speculative at this time and UTS would appreciate more time to engage with our student body.

UTS is also a member of the Australian Technology Network of Universities, and the NSW Vice-Chancellors' Committee, and is broadly supportive of their feedback regarding the proposed *Support for students policy.* In addition, several of our equity practitioners and student support officers are members of the Equity Practitioners in Higher Education Australasia (EPHEA) and Australian Disability Clearinghouse on Education and Training (ADCET) respectively – we understand both organisations are also planning to provide detailed submissions in response.

Recommendations: That the Department:

1. Suspend compliance with the *Support for students policy* until comprehensive consultation with the sector has taken place, including EPHEA and ADCET.
2. Take stock of the various (and necessarily different) policies, procedures, program, and initiatives that universities have approved and implemented in their efforts to support the academic success of their specific student cohorts.
3. Provide sufficient time and funding to allow universities to develop and implement any additional policy instruments, such as the *Support for students policy*, should it prove necessary*.*

UTS's student support policy framework

UTS is the top–ranked young university in Australia. Our vision is to be a leading public university of technology recognised for our global impact. As a university of technology, it is our role to ensure our graduates shape the future professions and businesses that will be needed in Australia and overseas in the decades ahead. Since our inception, an integral building block of our success has been our outward, global focus and ability to partner with industry. Our campus has no walls; it is deliberately designed to be porous and support connections, knowledge exchange and collaboration. This embodies our approach to engagement and permeates our teaching and research.

Our student body is diverse, and we encourage our students and staff to look at the world from different perspectives. As of 2022, we had 44,615 students enrolled in over 500 courses, including 11,180 international students. Between 2020 and 2022, our student enrolments by diversity indicator showed the following enrolment trends:

	2020	2021	2022
% International	29.8 %	26.4 %	25.1 %
% Female	49.1 %	49.9 %	50.3 %
% Indigenous	0.8 %	0.8 %	0.8 %
% <25	70.3 %	69.9 %	69.9 %
% Low SES (2016)	9.4 %	9.4 %	9.7 %
% NESB	32.6 %	29.3 %	27.7 %
% Born Overseas	47.6 %	44.8 %	43.4 %
% Home Lang Not English	46.0 %	43.5 %	42.4 %
% Disability	5.23 %	6.44 %	7.41 %
% First in Family	6.9 %	6.5 %	6.3 %

If these diversity indicators were mirrored across the sector, and in every faculty and school across the nation, then a national *Support for students policy* might be possible to implement. But as it stands, each university has its own unique cohort of students for which it has developed a comprehensive, fit-for-purpose suite of processes to monitor student progression and identify students in need of additional support (be that support for academic, financial, health and wellbeing etc). The *Support for students policy* risks undermining that careful work.

For example, the matters covered in the *Support for students policy* are summarised broadly below and include:

- processes for identifying students who need help.

- assessing a student's academic and non-academic suitability for continuing study, particularly where they have triggered an alert.

- connecting students to support—and identifying students who are not engaging with support before their census date wherever possible.

- **providing sufficient non-academic supports for students, such as financial assistance, housing information and mental health supports—this is important as many students struggle because of non-academic issues.**

- having appropriate crisis and critical harm response arrangements.

- providing access to trained academic development advisers who can help a student identify what's holding them back and come up with the right response for that student.

- ensuring that academic and non-academic supports are age and culture appropriate, including specific arrangements for Indigenous students.

- proactively offering 'special circumstances' arrangements where a provider is aware of a significant life event for a student.

- **providing access to targeted individual literacy, numeracy, and other academic supports.**

- providing provider-driven and evidence-based additional support such as peer support; and

- providing targeted in-course support from academic staff, such as check-ins and flexibility on assessment arrangements.

The points in bold above are particularly problematic from a compliance perspective and have the potential to create uncertainty between expectations and delivery. For example, any proposal to place thresholds around these two areas must be clearly defined (how is "sufficient" defined by government?) to avoid a situation where implementation is impossible to achieve and attracts a significant financial penalty for non-compliance.

In the short timeframe provided for this consultation, UTS has undertaken a rapid review of its comprehensive governance environment to illustrate how the *Support for students policy* overlaps with existing efforts to

support student progression. UTS rules and policies that address all the above points are outlined below, beginning with UTS's Student Rules which have the same force and standing as a by-law. The weblinks for these policy documents are hyperlinked in the text below and listed in the Appendix.

Student Rules

The Student Rules cover a suite of mandatory requirements for academic teaching, learning and research-related activities. The Rules cover student rights and responsibilities, all processes from admissions (Section 5) through to coursework and research requirements, to exams, assessments and graduations. The Rules also include details of processes for student misconduct and appeals (Section 16). Sections 8 and 9 are particularly relevant to the intent of the proposed *Support for students policy* as indicated by the headings:

> Section 8 – Assessment of coursework subjects
>
>> 8.2 Learning and assessment arrangements
>>
>>> 8.2.1 General
>>>
>>> 8.2.2 Students with disability or ongoing illness
>>>
>>> 8.2.3 Students with carer responsibilities
>>>
>>> 8.2.4 Students from non-English speaking backgrounds
>>
>> 8.3 Special consideration of disruption to assessment
>
> Section 9 — Examination of coursework subjects
>
>> 9.4 Special conditions for examinations
>>
>> 9.5 Rescheduled and alternative examinations

UTS Policies

UTS policies and procedures support staff, students and affiliates to work and study at UTS. The following are particularly relevant to the intent of the proposed *Support for students policy* and relevant sections are extracted with hyperlinks for viewing by the Department.

UTS policies relevant to coursework assessment:

1. Coursework Assessments Policy

    - principle 3.7 on 'support students' transition to study'
    - principle 3.10 on 'UTS will provide reasonable learning and assessment arrangements' and refers out to UTS Student Rule 8.2: Learning and assessment arrangements
    - statement 4.13 on students receiving feedback before their next assessment task and subject census dates.
    - statement 4.20 to 4.22 on fair assessment arrangements and extensions
    - statement 4.23 on progression – refers out to section 10 of the Student Rules
    - statement 4.24 on seeking advice from an adviser.

2. Coursework Assessments Procedure

    - statement 4.7 on meeting students' learning needs
    - statement 4.19 on subject coordinators providing advice during exams.
    - statement 4.24 onwards for special consideration and alternative arrangements
    - statement 4.28 'for students who feel their performance in an examination has been significantly disrupted due to circumstances beyond their control'.

UTS policies that address behavioural expectations:

3. Student Rights and Responsibilities Policy (statement 4.10 on support services)

4. Equity, Inclusion and Respect Policy

UTS policies that are related to equity and connecting students with support:

5. <u>Admissions and Recognition of Prior Learning Policy</u> (includes principles and statements to address educational disadvantage, accessibility impacts when determining admissions requirements and special admissions schemes, supported by procedures).

6. <u>Accessibility and Inclusion Policy</u>

7. <u>Concerning Behaviour Intervention Policy</u>

8. <u>English Language Policy</u>

9. <u>Feedback Survey Policy</u> (allowing for feedback on student, staff and course performance)

10. <u>Sexual Harm Prevention and Response Policy</u>

11. <u>Staff and Students with Carer Responsibilities</u>

12. <u>Student Accessibility Procedure</u>

UTS policies that address First Nations students:

13. <u>Indigenous Education and Research Strategy 2019-2023</u>

14. <u>Indigenous Policy</u>

UTS policy regarding complaints:

15. <u>Student Complaints Policy</u>

UTS policies regarding critical incident response and safety:

16. <u>Critical Incident Response Policy</u>

17. <u>Health, Safety and Wellbeing Policy</u> (statements 4.18 on academic staff responsibilities for students)

Clearly, there is a real risk that the highly prescriptive nature of the *Support for students policy* will overlap UTS's sound institutional policy framework and at worst undermine our efforts. UTS would welcome more time to evaluate the proposal for a national *Support for students policy.* In addition, the compliance deadline of the 2024 academic year is particularly concerning and should be reconsidered and extended pending this consultation with the sector.

Accordingly, UTS **recommends** to the Department that it suspend compliance with the *Support for students policy* so that further consultation can take place with the sector, including the EPHEA and ADCET. For example, our equity practitioners (as represented by the EPHEA) are contemplating ways to link the goals of the proposed *Support for Students Policy* with the AUA Interim Report which recommended the introduction of a needs-based funding model.

UTS also **recommends** the Department take stock of the various (and necessarily different) policies and procedures universities have approved and implemented in their efforts to support the academic success of their specific student cohorts. This approach would enable the Department to identify any perceived weaknesses or shortcomings in the sector's policies and suggest how they could be further strengthened.

The cost of compliance

With reference to Question 7 in the *Support for Students Policy: Guidelines Consultation Paper,* in the first instance the Department should leverage existing data held by it and other government departments (e.g., the Tertiary Collection of Student Information) to monitor and evaluate outcomes.

There are significant costs to universities associated with implementing regulatory and legislative changes (and related initiatives). While the same could be said of all organisations, regardless of the industry or sector, the university sector is subjected to a greater number of changing regulatory, legislative and compliance obligations than many other sectors.

To mitigate the high cost of compliance and increasing compliance demands, early and collaborative dialogue with government is encouraged, as well as consultation with higher education sector experts prior to implementation. Including university experts in decisions that impact universities' reporting and compliance obligations can highlight and resolve potential impacts, effectively prioritise the importance of conflicting

priorities, create better outcomes for universities, departments and Government, and ensure judicious, sustainable use of our respective financial resources.

Should the Department persist with seeking changes that have implications for our student systems, UTS **recommends** sufficient funding be provided to the sector to cover the administrative and project costs to enable universities to implement the *Support for students policy.* It is counterintuitive for government to expect enhanced reporting measures at the expense of diverting resources away from supporting students.

Contact details

UTS appreciates the opportunity to contribute to this brief consultation by the Department. Please do not hesitate to contact Ellen Goh, Manager of Government Affairs ██████████████████ should you wish to discuss this submission further.

UTS

Appendix of weblinks to UTS Rules and Policies:

- Accessibility and Inclusion Policy: https://www.uts.edu.au/about/uts-governance/policies/uts-policy/accessibility-and-inclusion-policy
- Admissions and Recognition of Prior Learning Policy: https://www.uts.edu.au/about/uts-governance/policies/uts-policy/admissions-and-recognition-prior-learning-policy
- Concerning Behaviour Intervention Policy: https://www.uts.edu.au/about/uts-governance/policies/uts-policy/concerning-behaviour-intervention-policy
- Coursework Assessments Policy: https://www.uts.edu.au/about/uts-governance/policies/uts-policy/coursework-assessments-policy
- Coursework Assessments Procedure: https://www.uts.edu.au/about/uts-governance/policies/uts-policy/coursework-assessments-procedure
- Critical Incident Response Policy: https://www.uts.edu.au/about/uts-governance/policies/uts-policy/critical-incident-response-policy
- English Language Policy: https://www.uts.edu.au/about/uts-governance/policies/uts-policy/english-language-policy
- Equity, Inclusion and Respect Policy: https://www.uts.edu.au/about/uts-governance/policies/uts-policy/equity-inclusion-and-respect-policy
- Feedback Survey Policy: https://www.uts.edu.au/about/uts-governance/policies/uts-policy/feedback-survey-policy
- Health, Safety and Wellbeing Policy: https://www.uts.edu.au/about/uts-governance/policies/uts-policy/health-safety-and-wellbeing-policy
- Indigenous Education and Research Strategy 2019-2023: https://www.uts.edu.au/about/uts-governance/policies/uts-policy/indigenous-education-and-research-strategy-2019-2023
- Indigenous Policy: https://www.uts.edu.au/about/uts-governance/policies/uts-policy/indigenous-policy
- Sexual Harm Prevention and Response Policy: https://www.uts.edu.au/about/uts-governance/policies/uts-policy/sexual-harm-prevention-and-response-policy
- Staff and Students with Carer Responsibilities Policy: https://www.uts.edu.au/about/uts-governance/policies/uts-policy/staff-and-students-carer-responsibilities-policy
- Student Accessibility Procedure: https://www.uts.edu.au/about/uts-governance/policies/uts-policy/student-accessibility-procedure
- Student Complaints Policy: https://www.uts.edu.au/about/uts-governance/policies/uts-policy/student-complaints-policy
- Student Rights and Responsibilities Policy: https://www.uts.edu.au/about/uts-governance/policies/uts-policy/student-rights-and-responsibilities-policy
- Student Rules: https://www.uts.edu.au/about/uts-governance/rules/uts-student-rules