

UNSW Submission – *Support for Students Policy* guidelines consultation paper

Overview

UNSW Sydney welcomes the opportunity to provide feedback on the *Support for Students Policy* guidelines. UNSW supports the removal of the 50 per cent pass rule and applauds the focus on student success. It is good for students, for institutions, and for Australia when students succeed.

However, we recommend that the appropriate mechanism to best achieve student success is through increased measurement and scrutiny of success rates. A focus on student success and possible pathways to reach it is preferable to enacting additional policies and processes that run the risk of unintended consequences and are no guarantee of achieving their stated goal.

Executive summary:

- TEQSA and other reporting requirements already effectively regulate student support.
- Additional reporting requirements run the risk that institutions focus on meeting their compliance obligations, rather than achieving the underlying goal. They also will likely divert resources away from student support.
- **Recommendation:** The best approach to supporting students and ensuring their success is through a combination of:
 - Improved monitoring and report against the *Higher Education Standards Framework (Threshold Standards) 2021* requirements and analysis of student data
 - Presenting guidelines and encouraging institutions to model 'best practice' against these guidelines.
 - Any incentives should be focused on achieving the desired outcome(s) relating to student success, rather than following a particular process.

Introducing additional policies beyond those already in place will not add additional rigour to the system, and is unnecessary given that TEQSA and Government reporting requirements already effectively regulate this area. The Guidelines as described in the consultation paper are overly prescriptive and may result in adverse unintended consequences, including institutions focusing on compliance at the expense of achieving the intended policy goal. The intended outcomes could instead be achieved through improved monitoring / reporting against the *Higher Education Standards Framework (Threshold Standards) 2011* requirements and analysis of student data (which the Government now has real-time access to via TCSI). As TEQSA already covers student support, the task

of increasing measurement and scrutiny of success rates should be relatively easy to achieve, and is recommended.

We recognise that student success is critically important and in our response to the Accord's Interim Report have provided additional suggestions on how to incentivise institutions to provide additional meaningful and tangible support in order to enhance student success across Australia.

The Proposed *Support for Students Policy*

In our experience, the best approach to achieving the desired outcome in this instance is through the development of guidelines, modelling best practice, and creating a national evaluation framework for the student support programs being offered by institutions.

Policies are by nature rigid instruments that do not afford the sector much needed flexibility, allowing universities to be responsive to the changing needs of students. Guidelines accompanied by 'best practice' models derived from Australian universities, together with a national evaluation framework for student support programs, similar to that being developed for targeted student equity funding under the SHEEHEF, would be a more effective and adaptable approach. This approach, coupled with reporting against performance-based measures, articulated as part of a contextually relevant *Compact Agreement* for each university, with incentives for meeting identified areas for improvement would likely result in better outcomes.

This alternative approach would also allow universities to channel their resources into the identified targeted areas that support students, rather than into compliance activities.

The proposed regulatory functions of the framework risk diverting resources away from student support programs to compliance activities. This would be counterproductive, resulting in an under-resourcing of these student support programs. Furthermore, a more rigid, regulation focused approach, is likely to push institutions to focus on meeting their legal obligations rather than the underlying intent of supporting students.

Practical issues associated with implementation of *Support for Students Policy* guidelines

The development of a *Support for Students Policy* satisfying the Guidelines stipulated by the Department within the proposed timeline presents a significant logistical and resourcing challenge to the higher education sector.

It is acknowledged that the implementation of a *Support for Students Policy* is tied to amendments to the *Higher Education Support Act 2003*. This is in response to recommendations made by the Australian Universities Accord which aim to support students from equity cohorts in particular. The Accord process promises to make a priority of equitable access and success in higher education, the Guidelines provide increased clarity regarding institutional accountability to support students to successfully complete their studies. However, this promise must afford institutions the appropriate time to properly review internal policies so as not to diminish existing practices and initiatives that may already align with the proposed Guidelines and other recommendations.

Should the Guidelines be approved, a grace period of 12 months following the ascension of the Amendments would provide universities with much needed time to assess the alignment of existing policies relative to the Guidelines. This would also provide greater scope for universities to understand the implications of implementing the Guidelines given changes to funding arrangements foreshadowed by the Accord (i.e. compact agreements tied to HE funding), in addition to existing reporting obligations via TEQSA and HEPPP/ IRLSAF and Performance Based Funding (PBF) reporting.

Conclusion

Thank you once again for the opportunity to provide feedback on the *Support for Students Policy* consultation paper. We remain committed to ensuring that students succeed at university, and believe this to be an important goal for our sector and for Australia. We would welcome any opportunity to work with you to achieve this important objective.

