

# Submission to Support for Students Policy Consultation

15 SEPTEMBER 2023



# ABOUT REGIONAL UNIVERSITIES NETWORK

The Regional Universities Network (RUN) welcomes the opportunity to make a submission to the Support for Students Policy Guidelines Consultation. RUN is a national collaborative group of seven regional Australian universities: Charles Sturt University, CQUniversity Australia, Federation University Australia, Southern Cross University, University of New England, University of Southern Queensland, and University of the Sunshine Coast.

This submission reflects the positions of RUN institutions, and in doing so, also aims to represent the views of those students and communities which RUN universities serve; the one-third of Australians who live outside of metropolitan centres in Regional, Rural and Remote locations.

## OVERVIEW

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RUN supports the intent of the Guidelines to enhance and safeguard the student experience across higher education providers and ensure that student support, success and wellbeing is prioritised. RUN's member universities pride themselves on providing opportunity and raising aspirations for traditionally underrepresented cohorts, and champion inclusivity and diversity in higher education. These institutions have comprehensive and effective policies in place to ensure that students have access to necessary resources and support. While supportive of the intent of the Guidelines, RUN welcomes the opportunity to provide input in their development and raise issues that we urge the Government to consider at this stage.

First, the lack of detail provided in the consultation paper makes it challenging to form a well-considered response. Given non-compliance with the Guidelines can result in adverse impacts for universities, we strongly advocate for further consultation with greater detail on the draft Guidelines, expectations for compliance, reporting requirements, and potential penalties.

Second, RUN has concerns around the timing of both the development and implementation of the Guidelines. These concerns are further explored below, however given the requested Higher Education Standards Panel

(HESP) review of the Threshold Standards in relation to student support the timing for developing the Guidelines is potentially premature. Additionally, while institutions already have policies in place that align with the expectations of the Guidelines, the proposed implementation ahead of the 2024 academic year does not leave enough time for universities to fully understand their obligations and create the structures needed to enable reporting.

Finally, RUN has concerns about the information that is being placed in the Guidelines relative to what is established in the Higher Education Support Act (HESA). RUN's preference, as outlined in more detail below, is for these measures to be addressed first and foremost through the Threshold Standards. Should the Threshold Standards not provide a suitable framework, then integrating them into the Act would be the next best approach, ensuring it's done in a manner that is light-touch and non-prescriptive. Placing key measures within the Guidelines creates a risk that they could be changed to suit political need rather than driving the policy reform they seek to achieve.

For further information please contact RUN on 0408 482 736 or [execdir@run.edu.au](mailto:execdir@run.edu.au).

# THRESHOLD STANDARDS

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RUN welcomes the acknowledgement in the Guidelines Consultation Paper about the role of the Tertiary Education Quality and Standards Agency (TEQSA) and the requirements for higher education providers to comply with the Threshold Standards. The Threshold Standards set out the minimum acceptable requirements for the provision of higher education in or from Australia by higher education providers registered under the Tertiary Education Quality and Standards Agency Act 2011. RUN is unclear on the purpose of creating separate Guidelines for university procedures that should sit within the Threshold Standards.

RUN welcome the news that the Minister for Education has requested that HESP review the application of the Threshold Standards in relation to student support and whether the findings from the HESP 2018 report – Improving Retention, Completion and Success in Higher Education – have been implemented and the impact of those findings.

However, RUN does have concerns about the ordering of developing Guidelines before the work of HESP is completed, duly considered, and utilised for the creation of the Guidelines. Developing the Guidelines prior to the work of HESP being completed could result in unnecessary duplication of consultation, legislative drafting, and the incorrect focussing on higher education provider policies for student support. RUN would welcome further exploration and consultation on whether the intent of the Support of Students Guidelines is currently covered by the Threshold Standards.

## **I RUN RECOMMENDS**

*Holding the development of the Guidelines until the work of HESP is completed.*



# NATIONAL CODE FOR OVERSEAS STUDENTS

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- 1. Are there features of the Code that could also be applied to domestic student support and included in the Guidelines?*
- 2. How do we ensure that the Code and the new arrangements work together effectively?*

RUN is of the opinion that most universities, if not all, would be providing the same level of support for domestic and international students, so would already be meeting the requirements of providers specified in the National Code of Practice for Providers of Education and Training to Overseas Students 2018. While the measurements collected from the various instruments would be different, the underlying principles would remain the same.

RUN cautions against establishing separate supporting mechanisms for international and domestic students and would recommend that the Guidelines utilise the same criteria and principles. This reduces compliance costs for Australian universities, enabling greater funding to be spent on student support measures. It also has the benefit of building upon the existing policies and procedures that universities have in place. Further, it ensures commonality of expectation between domestic and international students. No student, domestic or international, should expect differing levels of support from higher education providers.

## **I RUN RECOMMENDS:**

*Ensuring alignment between the National Code of Practice for Providers of Education and Training to Overseas Students 2018 and the Student Support Guidelines.*

# HIGHER EDUCATION PROVIDER GUIDELINES

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- 3. What other detail should be included in the Guidelines and why?*
- 4. Are the proposed individual student and institutional level requirements practical, and implementable? If not, how could they be improved?*
- 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?*

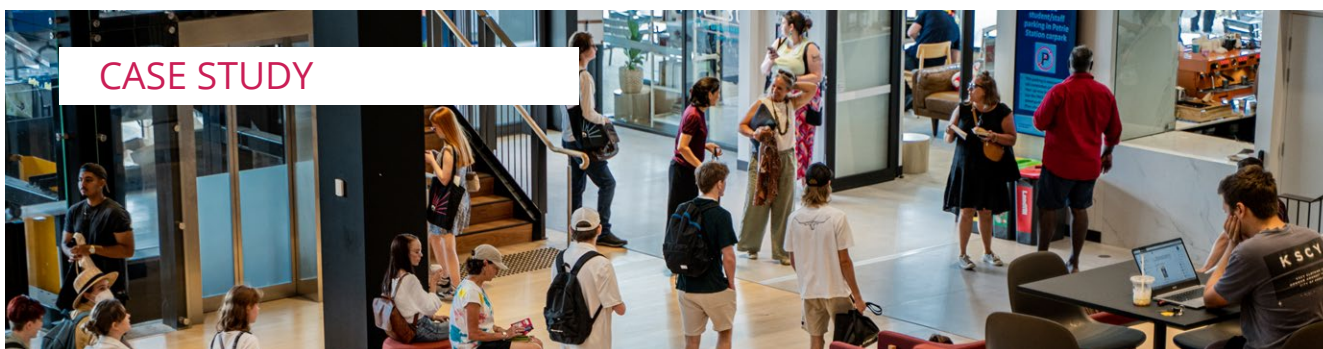
While RUN welcomes the acknowledgement that it is not expected that there will be a one size fits all response to the minimum policy requirements, this does create additional complexity to drafting the policy in a transparent, manner increasing monitoring and reporting complexity for the Department of Education.

RUN agrees that universities should develop and apply student entry procedures appropriate to their mission, context and cohort and have practices to identify, protect and provide support for vulnerable students and students at risk of failing. For regional universities these practices are core to their ongoing operations.

RUN argues that many, if not all, universities would be currently able to demonstrate compliance with the proposed requirements and that most are already publicly available on university

websites and that universities communicate these options frequently to students. Significant work has also been committed to building innovative and evidence based support. CQUniversity, for example, provides students with access to a peer-to-peer engagement platform, Chronus, which supports mentoring and tutoring, and the university's award winning and nationally accredited Peer Assisted Student Sessions (PASS) program facilitates evidence based peer support. Additionally, RUN member universities have robust procedures in place to ensure students have various avenues by which they can raise complaints about teaching quality and services and that such complaints are addressed through appropriate grievance resolution procedures. Complaints and student course evaluation data are also used by institutions for quality assurance and improvement to address any identified systemic concerns.

In a situation where universities are meeting their obligations under the Threshold Standards and evidence demonstrates that the university is meeting their obligations to support students, however they do not have one of the requirements in place, the consultation paper is unclear on what the expectations would be of a provider. Given the diversity of providers across the sector, and the diversity of student cohort and approaches to providing support, how are universities to adequately know their obligations and expectations? Further to this, RUN has concerns regarding language such as "that sufficient resourcing is available to adequately" in the proposed Guidelines as being unclear. The key question here is what is the threshold of sufficient resourcing and how is that determined on a university-by-university basis?



## Monitoring Academic Progress (MAP) at UniSC

UniSC uses a robust Monitoring Academic Progress (MAP) process to provide a staged approach to proactively identifying students who are at risk of failing a course and to contact them to co-design strategies that will help them succeed through the range of academic learning and wellbeing services available. Approximately one per cent of students identified in stage one received a stage three notification.

### Stage one: Early intervention

The purpose of MAP Stage 1 is to identify students who may need access to support or services to improve their academic performance, as early as possible in their academic career.

### Stage two: Monitored enrolment status

Identify students who will be placed on monitored enrolment, because they are at risk of making unsatisfactory academic progress.

### Stage three: Consideration for exclusion

Following the release of results, student services and Engagement will notify students meeting an exclusion criteria, and the student will be given an opportunity to seek a review.

# REPORTING

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

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?

In establishing reporting requirements, RUN urges consideration of how existing requirements can be leveraged in line with a 'report once, use often' principle to ensure the administrative requirements are not burdensome for universities or the Department. Current Tertiary Collection of Student Information (TCSI) requirements and associated transmitted information from providers to the Department could be updated to reflect actions required to be taken with the Support for Students Policy in a way that is light-touch and risk-based. Providing data through additional TCSI reporting elements would allow the Government to not only ensure policies were being met at an institutional level but also undertake analysis and identify trends across the sector. However, even implementing reporting by expanding existing methods would require more time than the ambitious schedule set out in the consultation paper.

RUN urges that additional reporting on the effectiveness of the policy as well as identified opportunities for improvement be required only as necessary, and at a frequency no greater than annually. This would ensure an appropriate period to understand effectiveness as well as identify potential improvements.

Additional considerations RUN would urge consideration of in any reporting requirements include:

- the need to ensure student privacy
- differences in university student support policies as a result of the different communities they serve
- the need to ensure that institutions catering to students with higher needs do not face a higher administrative burden as a result
- the recognition that the intricacies of student support and individual student experience are multi-faceted and complicated, and purely quantitative metrics may not paint the entire picture.

# COMPLIANCE

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RUN notes that within the compliance section of the Guidelines consultation paper it states that compliance will be monitored and evaluated by the Department of Education, however the document also states that the Minister, Department, or TEQSA can take action to address non-compliance, creating ambiguity around oversight and responsibility. It is crucial to delineate the roles and responsibilities of each entity clearly as well as which holds ultimate responsibility for compliance. This clarity would enable higher education providers to ensure that they are aligned with expectations, as well as streamline reporting processes and potential investigations.

## **I RUN RECOMMENDS:**

*A more clearly defined oversight structure with identified and delineated roles regarding compliance.*

# NON-COMPLIANCE

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

RUN universities take their responsibilities to the student, the Government, and the public seriously, however it is essential that universities are given a clear understanding of what these responsibilities entail. What constitutes non-compliance, as well as the process for investigation, need to be explicitly outlined to provide clarity to students, investigators, and institutions.

One crucial element that needs to be defined are the reasonable efforts a university is expected to implement to support a student, and how that will be measured. Each university has strategies in place to track student progress and reach out to disengaged students or those requiring additional support. However, while universities can provide advice and make outreach efforts, they cannot force a student to take a particular action and must have respect for the choices and agency of the student. For example, one member university has reported that 50 per cent of their phone calls, text messages, and emails to students at risk receive no response from the students.

If an investigation is triggered, the process must be transparent and well-understood by all involved. Universities should have clarity around the evidence they would be required to produce, and thought must be given to the logistical and financial implications of data collection and storage. Would universities be required to retain additional data beyond regular reporting requirements for potential investigations? And, if so, what would be the cost implications? If the data is provided to the department in case there is an investigation, there are also considerations of data privacy and security.

When addressing cases where a university has been found to be non-compliant, the response should be precisely defined and proportionate to the nature and extent of non-compliance and take into consideration efforts made by the university to rectify a problem once identified.

### **I RUN RECOMMENDS:**

*Clarity around definitions of non-compliance, the process for investigation and proportionate consequences.*

# IMPLEMENTATION

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

The expectation for universities to meet the requirements of the Guidelines by the start of the 2024 academic year raises concerns about the feasibility of the timeline. While RUN universities recognise the importance of ensuring universities are providing adequate student support, the timeline as proposed is not sufficient for both implementation within institutions and for capturing the requisite data.

While RUN's member universities each have foundational policies in place that comply with the proposed requirements, there may be work required to expand or modify policies as well put in place necessary administrative measures for reporting. It is reasonable to provide universities with adequate time to interpret, understand and implement new requirements, particularly given the requirements carry penalties for non-compliance.

### **I RUN RECOMMENDS:**

*A more considered timeline that allows universities to make required policy and reporting changes.*