



Support for Students Policy: Consultation paper

University of Tasmania Submission

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UNIVERSITY of
TASMANIA 

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Image: University of Tasmania students at the Inveresk campus in Launceston

Introductory Statement

At the University of Tasmania, we strongly support the focus on equity of access to education for all Australians set out in the Australian Universities Accord Interim Report. We are pleased to see the introduction of legislation to enable the implementation of Priority Action 2, ceasing the 50% pass rule, and Priority Action 3, extension of demand driven funding for First Nations students.

We support the intention of the 'support for students' policy requirements, to ensure all students are appropriately supported during their studies, and we welcome the opportunity to participate in this consultation process.

On the matter of compliance, while we consider the proposed compliance requirements important as a minimum standard, we believe that to see real change in educational outcomes within Australia the tertiary sector needs to aim for best practice and excellence in providing student support.

We suggest an approach is considered which identifies and incentivises best practice and innovation across the sector, as a more effective approach than solely introducing additional monitoring, reporting and non-compliance penalties.

This could include sharing information and resources across the sector to aid universities in developing student support programs and initiatives, like the TEQSA Higher education good practice hub. This could also involve a regular process for reviewing and updating the guidelines, with the aim of collectively steering the standard approach across the sector to best practice outcomes. Feedback from students and from universities will be important to understand what works best in practice to support students to succeed in higher education.

We do not support the notion of the Department of Education as the regulator of the student support compliance requirements. We consider the proposed reporting and compliance measures could be integrated with TEQSA and have provided examples throughout our submission of where alignment exists between current reporting requirements for the sector and the proposed support for students measures.

The required increase in the number of people with a tertiary qualification in Australia, as outlined in the Accord Interim Report, means we will need to significantly grow the number of students from educationally disadvantaged backgrounds – including low-SES, students with disability, Indigenous students and those living in regional and remote locations.

These students typically require more support than educationally advantaged students, and it is important that universities are prepared, enabled and encouraged to provide this support in a student-centric way. The future funding model for universities will need to address how to assign funding in an equitable way, to support educationally disadvantaged students and to incentivise student completions. In our September 2023 [submission to the Accord Interim Report](#) we have proposed the design of a funding model for universities which includes equitable success funding to support participation for equity cohorts.

There are examples internationally of universities who have successfully implemented strategies to improve outcomes for all students. Georgia State University is an exemplar for how to build a model to achieve student success, having transformed their approach to student support which is now demonstrating significant benefits to students.

Over a 10-year period, they have increased their graduation rate by 24 percentage points (a 75% increase); grown the number of degrees awarded annually by 84%; reduced the average completion time by a semester; and eliminated historical educational achievement gaps based on race, ethnicity, or income. We provided this example, and suggestions on how this approach could be adopted for the Australian tertiary sector, in our April 2023 [submission to the Australian Universities Accord consultation](#).

Following are the University of Tasmania's responses to the questions raised in the Support for Students Consultation Paper.

We would welcome the opportunity to provide further information on any of the responses we have provided in this submission.

Question One: Are there features of the Code that could also be applied to domestic student support and included in the Guidelines?

There is already considerable alignment between elements of the Higher Education Standards Framework (HESF) and the National Code of Practice for Providers of Education and Training for Overseas Students (the Code) in relation to student support. However, the Code includes elements on ancillary costs and student safety, which the HESF currently does not. It is our view that the HESF requirements should include these elements, to be applied to all enrolled students (both domestic and international).

We propose that the student support elements in the HESF and the Code are combined and replicated in each instrument for consistency. The Code could then supplement this with additional or specific support arrangements that are considered to apply only to international students. We suggest the student support elements in a combined approach could include:

1. The provision of equal opportunities to access support required at no extra cost, regardless of entry pathway, mode or location.
2. The establishment of processes to identify students at risk (and to provide support for these students).
3. The provision of learning support and documented processes for supporting and maintaining contact with students who are undertaking online or distance units of study.
4. Access to information on the supports available for students.
5. Reasonable steps taken to provide a safe environment on campus, and advice for students on actions they can take to enhance their personal security and safety.
6. The provision or facilitation of support amenities including emergency services, health, accessibility, counselling, legal advice, advocacy, accommodation and welfare support.

Question Two: How do we ensure that the Code and the new arrangements work together effectively?

The proposed requirement that all higher education providers have a Support for Students Policy in place means that providers must cover the requirements of the HESF (including any new arrangements) and the Code in a single policy document. The alignment of requirements in the HESF and the Code to create a consistent approach to student support would effectively simplify this.

Question Three: What other detail should be included in the Guidelines and why?

We support the items proposed within the Consultation Paper for inclusion in the Guidelines. In addition, we recommend that the Guidelines reference the need to analyse demand for student support services, to uncover patterns related to bases of admission, and to ensure students are entering into appropriate pathways regarding suitability for study.

This analysis work is crucial to the early identification of at-risk students who may require further support to study.

Question Four: Are the proposed individual student and institutional level requirements practical, and implementable? If not, how could they be improved?

We consider the proposed student and institutional requirements to be sensible and practical components of a Support for Students Policy. We note that funding for universities, particularly for those in regional locations or with higher numbers of educationally disadvantaged students, will need to be adjusted to provide the proposed support measures at increased levels.

Supporting students with early intervention strategies is known to optimise student progression and completion. Support plans and provisions are often resource intensive, and it will be important to ensure universities with a high number of students requiring these supports are properly resourced to deliver these services consistently.

A considered approach to funding support for students will be essential to increasing educational participation for equity groups and regional students. The funding model for universities is fundamental in this, to ensure there are not unintended consequences that disincentivise universities from increasing numbers of students who are likely to need support while they study.

Regarding the arrangements to provide non-academic support for students, including financial assistance to aid housing/cost of living challenges, we recommend providing clearer guidelines on what type of arrangements these should be. Whilst universities can play a part in sharing information, connecting students to support services, and facilitating access to scholarships, the government also has a key role to play in assisting students experiencing non-academic hardship.

Factors such as increasing and reforming Austudy arrangements, and community funding for access to mental health services within regional locations, are examples of initiatives that would have significant positive impact on students.

Question Five: 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?

We suggest the following resources, which all propose strategies to improve student completion rates and retention through the provision of support for at-risk students:

- Higher Education Standards panel (HESP). Discussion Paper on Improving Completion, Retention and Success in Higher Education (2017).
<https://www.education.gov.au/download/3701/discussion-paper-improving-completion-retention-and-success-higher-education/5406/document/pdf>
- Tippets, J. & Kirby, J.D. (2019). Ascend to higher retention rates: Practical strategies for increasing student retention, completion and student success.
- Huijser, H., Kek, M., and Padró, F.F. (2022). Introduction: Student support services in an overall ecology of learning. In H. Huijser, M. Kek & F. Padró (eds.) Student Support Services. Springer. https://link.springer.com/content/pdf/10.1007/978-981-16-5852-5_49.pdf

- Kift, S., Nelson, K, & Clarke, J. (2010). Transition pedagogy: A third generation approach to FYE - A case study of policy and practice for the higher education sector. *International Journal of First Year in Higher Education*. 1(1), pp. 1-20.
<https://fyhejournal.com/article/view/13>
- Higher Learning Commission, Discussion Paper on Defining Student Success Data: Recommendations for Changing the Conversation (2018).
<https://download.hlcommission.org/initiatives/StudentSuccessConversation.pdf>

Question Six: What other reporting requirements need to be included to demonstrate compliance with the Support for Students policy requirements?

We consider the reporting requirements proposed within the Consultation Paper will be more than adequate to demonstrate compliance. We suggest that a standardised template be developed for all providers to use to ensure consistency and enable comparisons across the sector.

Regarding the suggestion of reporting on HELP expenditure on failed units of study (per student and overall), we question whether that information is required within this reporting requirement, as it is already provided to Government on a regular basis through the Tertiary Collection of Student Information (TCSI). Including this within the Support for Students Policy would result in duplication.

On frequency of reporting, we propose annual reporting as this aligns with the requirement for universities to review and update their Support for Students policies annually. With this suggestion, we note that any student data reported on would be current at a specific point in time – students with unit failures may still be under review or appeal and/or eligibility for re-crediting or fee remission under HESA. The reporting requirements will need to enable a longitudinal ability to observe student progression and outcomes of supports and interventions.

Question Seven: 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?

Universities already report to TEQSA against both the HESF student support standards and the National Code through CRICOS registration. Therefore, creating linkages between these existing standards and the new requirements would be beneficial to avoid duplication in reporting. We proposed in our response to Question One that the student support elements in the HESF and the Code be rationalised; this would support a consistent approach to reporting.

In our view, caution needs to be taken in framing the metrics and thresholds used to evidence effective support for students. Student success for individual students does not always mean progression to the next study period. Sometimes the best outcome for a student might include a leave of absence, a reduced study load, or time to focus on mental wellbeing (refer to “Discussion Paper on Defining Student Success data: Recommendations for changing the conversation” Higher Learning Commission, 2018).

Question Eight: What needs to be taken into account in the Department's approach to non-compliance?

We suggest the Department's approach to non-compliance could usefully be nuanced through integration with TEQSA's Risk Assessment Framework. Through this process, provider risk assessments are issued on an annual basis and inform TEQSA's approach to regulation, which is guided by the principles of risk, necessity, and proportionality.

The Department could use these assessments to avoid a 'one size fits all' approach to any new requirements around student support. Consideration should also be given to the relationship between TEQSA's renewal of provider registration and CRICOS registration processes. Compliance with the standards in the HESF and the Code, respectively, are already included in these processes. The Department and TEQSA could cross-reference the outcomes of these existing processes to avoid duplication of effort for themselves and for providers.

As noted in our introduction, we suggest that measures in addition to non-compliance need to be considered to continually develop the capability of the tertiary sector in providing successful student support measures. This approach will be more effective in achieving positive outcomes for students than non-compliance measures.

Question Nine: What practical considerations need to be taken into account in implementing the Guidelines?

We consider there is an opportunity for an aligned approach within the existing support for student initiatives and reporting process under the HESF and the Code. Duplication can be avoided by expanding these existing arrangements to include the proposed elements within the Support for Students Policy Guidelines.

We also suggest the governance requirements for a universities' Support for Students Policy are considered. The wording within the Consultation Paper suggests a single policy is needed; but universities should already have well established policies in place that respond to these requirements. We suggest a sensible approach would be that the new Support for Students Policy requirement is a framework that brings together all related policies into one location for ease of student access.

As we have indicated in our submission, the supports that students require can be broad and include both academic and non-academic initiatives. Rather than attempting to create one policy to consider and guide such a varied group of approaches, an overarching 'Support for Students Policy Framework' will mean students can easily identify the broad range of supports available to them, and universities will be better able to integrate their existing policies and procedures and other relevant governance instruments.