SUPPORT FOR STUDENTS POLICY CONSULTATION PAPER

University of the Sunshine Coast submission

September 2023

Contents

Executive Summary

The University of the Sunshine Coast (UniSC) welcomes the Australian Government's focus on further measures to maximise student success, which is entirely consistent with our mission and values. Indeed, UniSC's long standing reputation for excellence in student support and experience reflects our commitment in this critically important area.

UniSC called for the removal of the 50% pass rule, given its adverse impacts on equity students and because we already have robust and constantly evolving academic monitoring policies and procedures designed to maximise student progression and success.

UniSC therefore supports the Government's intention to remove the 50% pass rule, however we believe student support services can be strengthened where required in a way that does not duplicate existing measures or add further compliance, monitoring or reporting complexity for universities. UniSC suggests the Government's objectives can be met by revising the existing student support measures in the Threshold Standards (noting a review is underway), the National Code and/or the Department of Education's compliance powers and ensuring universities are held accountable to those revised benchmarks.

Recommendation 1

Instead of creating a Support for Students Guideline and associated regulatory framework, revise the existing Threshold Standards, National Code and/or the Department of Education's compliance powers.

Recommendation 2

Require universities to map their student support policies and procedures to the Threshold Standards (including any revisions) and any further student support legislation and policy requirements that the Government chooses to create, to demonstrate alignment and deliver transparency and accountability. Ensure there are clear remediation processes and timeframes for universities that are not compliant with the revised Threshold Standards.

Recommendation 3

Leverage the established mission based compact approach to demonstrate that the Government and higher education provider have a shared and mutual commitment to provide students with high quality educational experiences and outcomes, while recognising that each provider is an autonomous institution with a distinctive mission, operating within a state or territory, national and international higher education environment.

Recommendation 4

Should the Support for Students Policy approach proceed, provide universities with a 12-18 month transition timeframe.

Recommendation 5

In the medium term, consider establishing a single, holistic pastoral care code covering domestic and international students (e.g. New Zealand Code of Pastoral Care practice for domestic and international learners) to provide one set of clear expectations for providers.

1. Introduction

The University of the Sunshine Coast (UniSC) is pleased to provide a submission in response to the Australian Government's consultation paper on the Support for Students Policy.

Our submission is structured as follows:

1. Current student support measures
2. Changes to Higher Education Provider Guidelines
3. Examples of best practice.

UniSC would welcome the opportunity to elaborate on any aspect of our submission. If this is of interest, please contact Jason Mills, Head of Government Relations, UniSC at jmills3@usc.edu.au.

1.1   About UniSC

UniSC was founded by its community in 1996 after Sunshine Coast residents campaigned for locally provided tertiary education opportunities. As the first greenfield university to open in Australia since 1975, UniSC has helped unlock its regional communities' innovation, productivity and potential through the contributions of its 33,000 graduates and 17,500 current students studying a diverse offering of in-demand higher education programs.

UniSC provides opportunities across our campuses for a diverse student population, with 3.7 per cent identifying as First Nations, 13.3 per cent with a disclosed disability, 20.5 per cent from low socio-economic backgrounds and 19.9 per cent from a regional or remote location. Of particular note, the proportion of our students with a disclosed disability has grown from 5.6 per cent in 2019 to 13.3 per cent in 2023 which has resulted in an increase in resourcing demands to provide for the growth in the number of students with complex support needs.

Consistent with our mission to improve access to higher education in underserved locations, UniSC has strategically expanded its footprint into more regional communities, encompassing areas from Moreton Bay to the Fraser Coast. We collaborate closely with all levels of government, regional leaders, industry, and other partners to ensure our programs, research and support services align to create greater opportunities in all our host communities.

Among public universities, UniSC is number one in Queensland for overall educational experience, and the best in Australia for postgraduate skills development[1]. In the Good Universities Guide 2023, we achieved five-star ratings in key areas such as teaching quality, overall experience, learner resources, learner engagement, skills development, social equity and student support[2].

UniSC is also committed to amplifying the student's voice through our Students as Partners (SaP) program, which helps students build networks, improve their experience and develop qualities and skills aligned with graduate attributes[3]. Through this partnership, UniSC co-designs strategies to support the success of our students from diverse backgrounds.

---

[1] https://www.qilt.edu.au/surveys/student-experience-survey-(ses)#latest
[2] https://www.gooduniversitiesguide.com.au/course-provider/university-of-the-sunshine-coast-unisc/ratings-rankings/undergraduate
[3] https://www.usc.edu.au/current-students/students-as-partners

2.   Current student support measures

As noted in the Consultation Paper, higher education providers must already comply with student support requirements under the *Higher Education Framework (Threshold Standards) 2021* and TEQSA has powers to take necessary compliance action.

Universities are also required to comply with the student support items in Part D of the *National Code of Practice for Providers of Education and Training to Overseas Students 2018* (National Code), which mirror existing domestic student support activity provided by universities, particularly Standards 2, 6, 8, 9, 10 and 11.

In addition, again as noted in the Consultation Paper, the Department of Education has existing compliance powers, including to investigate complaints, to re-credit a student's HELP balance and remit their student loan in certain circumstances, and to take compliance action against higher education providers that are failing in their obligations or have committed infractions.

Therefore, UniSC suggests that if the Government believes that currently legislated student support requirements or regulatory powers are deficient, then a more appropriate approach would be to revisit the existing Threshold Standards, National Code and/or the Department of Education's compliance powers. Creating a fourth regime is not only poor regulatory practice, it will increase the already substantial reporting burden of universities.

Further to the above, UniSC contends that any changes to the Threshold Standards (or indeed the creation of a Support for Students Policy Guidelines if that is what the Government ultimately decides to do) are premature given the Government has asked the Higher Education Standards Panel to review the Threshold Standards in relation to student support.

Further, UniSC urges the Government to consider international best practice in this area to arrive, over time, at a more holistic and less burdensome arrangement for a sector that is already heavily regulated. For example, the approach taken by the New Zealand Government, which introduced a Code of Pastoral Care practice for domestic and international learners[4], could be considered. As described by the New Zealand Qualifications Authority, the Code provides one set of clear expectations for providers that can be tailored to their students' needs to improve the wellbeing and safety of domestic and international students. It is important to highlight the New Zealand Government's focus is on ensuring outcomes and flexible practices that enable providers to support their learners in ways that best meet their needs. This approach recognises that universities already have policies and procedures in place that are applied in ways that are in the best interests of their students and that universities demonstrate compliance using existing quality assurance and external review processes.

3.   Changes to Higher Education Provider Guidelines

3.1   Policy

UniSC has comprehensive policies and procedures that align with the Threshold Standards as well as the proposed requirements outlined in the Support for Students Policy consultation paper. We also have enabling plans that complement our student support policies and procedures, have mapped the student journey, aligned relevant services and supports available to students across the student lifecycle and embedded a continuous improvement approach to our policies and procedures. UniSC reports quarterly on student wellbeing and safety (including deidentified student data) to our Audit and Risk Management Committee and Governing Council. Our policies and procedures are reviewed against the Higher Education Standards through internal audits and external reviews, industry accreditation, and TEQSA registration renewal processes.

---

[4] https://www.education.govt.nz/further-education/information-for-tertiary-students/code-of-practice-pastoral-care-domestic-tertiary/

UniSC is therefore of the view that universities should be required to map their existing policies and procedures to the Threshold Standards and regularly review performance to demonstrate robust governance processes.

UniSC is also concerned that the consultation paper does not adequately address student diversity and associated complex needs, and students' human rights and the university's responsibilities to address these. Furthermore, ensuring that all students are suited to their program of study is not a simple process. For example, issues such as the ability to meet inherent requirements might not emerge until placement or a student may have a fluctuating functional capacity that may not be evident at the time of admission. Universities cannot prevent students from enrolling in a program if they meet tertiary entry requirements. Yet the major factors that contribute to attrition are not academic, but personal factors, which universities do their best to address, but clearly, there are limits when it comes to students' financial circumstances, health and family situations, which can derail students.

UniSC already monitors student engagement proactively, but universities cannot force a student to engage in support services, nor can universities connect with all students who require assistance, e.g. nearly 50% of UniSC support team phone calls, text messages and emails to students at risk receive no response from students. If a student continues to disengage and fails, they will be picked up through UniSC's rigorous Monitoring Academic Progress (MAP) processes, and that may lead to exclusion for a year with conditions applied before students can re-enrol. However, students can appeal the decision, and if that is upheld because the student was able to show cause (e.g. due to fluctuating mental health issues), the student may be readmitted with an academic improvement plan designed to support their success.

3.2   Reporting and compliance

UniSC argues a more appropriate reporting approach to demonstrate compliance with the Threshold Standards, and consistent with the intent of the Support for Students Policy, is through the established Mission Based Compacts. Compacts demonstrate that the Government and higher education provider have a shared and mutual commitment to provide students with high quality educational experiences and outcomes while also recognising that each provider is an autonomous institution with a distinctive mission, operating within a state or territory, national and international higher education environment.

3.2   Implementation

As noted above, UniSC believes a more appropriate approach to the creation of a Support for Students Policy and associated Guideline amendments is to amend existing legislation and regulatory instruments to ensure they achieve the policy objectives of the Government. As currently proposed, the Support for Students approach will be duplicative and require significant upfront expenditure and resourcing to implement the required TCSI changes, as well as additional ongoing resourcing to comply with the proposed reporting regime.

Should the Support for Students Policy approach proceed, UniSC does not believe it will be possible for most providers to be ready to meet the requirements by the start of the 2024 academic year. It is already mid-September 2023 and the required legislative amendments and Support for Students Policy guidelines remain incomplete. In addition, the HESP review of the Threshold Standards remains in progress. Given the complexity of the systems modifications required to meet the proposed reporting requirements, as well as potential student privacy issues to address, a 12-18 month transition timeframe would likely be required.

4.   Examples of best practice

As noted in previous sections of this response, UniSC has mapped the student journey, aligned relevant services and the supports available to students across the student lifecycle, and implemented quarterly reporting of the impact on student outcomes to ensure proactive responsiveness to areas needing improvement. We have also implemented a program analytics dashboard to provide management with data on program performance across a range of measures including student retention, progression and success, data from the student experience and graduate outcomes surveys, course evaluations as well as internal deidentified data on the number of grievances received for courses/programs and reviews of grade requests. These data provide a mechanism for proactively identifying courses and programs that require intervention.

UniSC also utilises learning management system analytics to identify students at risk to enable timely intervention as required. We have invested heavily in systems development to improve the integration of data, thereby enabling relevant support teams to access the data required to proactively support students who are disengaging from their studies and/or services.

UniSC uses a robust Monitoring Academic Progress (MAP) process to provide a three-stage approach to identifying students who fail 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. However, as noted earlier, there will always be a proportion of students who do not respond to communications and offers of support. Through the final stage of the MAP process, disengaged students will eventually be excluded, with conditions applied for readmission (e.g. agreeing to engage with available support services and a commitment to an academic improvement plan).

UniSC is also implementing a new curriculum design framework, co-designed with stakeholders, that adopts a pastoral care approach to curriculum design and learning and teaching delivery. The 'advising approach' embedded within the curriculum design framework aims to ensure students at every stage of the student journey develop the skills required to succeed in their studies and as graduates. These skills include building connections, help-seeking, autonomy, well-being, career identity and academic literacy. This approach provides a strength-based approach to supporting students to develop the strategies they need to succeed, complemented by a suite of services for students who require additional support, including counselling, reasonable adjustments and program and career guidance.