

15 September 2023

Department of Education
GPO Box 9880
Canberra ACT 2601

Submission to the Consultation Paper on 'Support for students policy' requirements

Swinburne University of Technology commends the Universities Accord panel and Minister for Education in putting First Nations people, lower socio-economic groups, people with a disability and those from rural, remote and outer suburban communities at the heart of the Accord.

Swinburne appreciates this opportunity to make a submission in relation to the Commonwealth Governments proposed policy approach to the Higher Education Provider Guidelines through the Consultation Paper on '*Support for students policy*' requirements.

We welcome the immediate extension of demand-driven funding to metropolitan First Nations students and the end of the 50% pass rule that greatly disadvantaged students from equity groups. We are eager to work with the Accord Panel and the Department of Education to review existing guidelines and reporting requirements to strengthen support for our students.

To achieve change, governments and universities will need to continue to foster increased levels of research, innovation and monitoring to tackle this multifactorial challenge. Among the areas Swinburne see as most promising are:

- **More effectively monitored outreach programs**, that are effective in inspiring and building interest among prospective students. Swinburne already has numerous programs including our successful Children's University and the In2Science program with high school students, which provide immersive university education experiences for participating students.
- **Greater use of data to rapidly refine and improve support programs for equity cohorts**, especially as they transition into university. In a data-rich digital university environment, there are new opportunities to identify quickly what works. For example, here at Swinburne, we have been engaging for some years in regular modelling of the propensity for students to drop out coupled with outreach to those students to offer a conversation and tailored support.
- **Create and pilot new outreach and learning support models**. A good example is Swinburne Online where, in partnership with OES, we have developed a capacity to support the success of a substantial group of mature students from equity cohorts as they gain a degree online and obtain access to a chosen profession.
- **Increase targeted support programs such as WIL and mobility scholarships** to enable students from equity cohorts to undertake high-value educational opportunities such as internships and global experiences to build capabilities and connections that will foster positive post-graduation outcomes. Swinburne has initiated the development of such programs as part of its commitment to a program of scaffolded WIL for every Swinburne student.
- **Improved living support for equity cohort students**. For example, increased access to Study Allowance, greater financial support to undertake Work Integrated Learning (WIL) or further studies.

Achieving participation targets for equity will require a needs-based funding model. Swinburne supports the interim report exploring the potential for a student-centered, needs-based funding model that recognises the additional costs involved in teaching students from equity groups and underrepresented communities.

Across the university and working with our online partner OES, Swinburne currently has in place, mature and robust processes to identify, support and empower our students across their study journey.

Complement rather than adding to existing reporting requirements

Higher education (HE) providers must continually review and update policies and support for students. For this support to be effective to a diverse cohort, providers need to be enabled to be innovative in taking an evidence-based and data driven approach. **We recommend that the guidelines focus on intended outcomes rather than approaches.** In addition, by not being overly prescriptive the guidelines will provide flexibility for providers to construct a model that is fit for purpose for their unique student cohort.

Swinburne agrees that, given the diversity of the HE sector, a one size fits all approach shouldn't be applied to the minimum policy requirements. A *support for students policy* needs to be flexible and complement, not add to the existing reporting frequency or requirements.

In principle, Swinburne supports the proposed information to be included in the guidelines and their proactive approach, **however we recommend that they form part of the existing reporting framework to the Tertiary Education Quality and Standards Authority (TEQSA)** rather than monitored and evaluated directly by the Department of Education whose responsibilities do not directly include regulatory and compliance activities. As you know, TEQSA has primary responsibility for the regulation of HE providers in Australia. The Threshold Standards administered by TEQSA are key to regulating the objectives of the TEQSA Act, many of which concern student wellbeing and student experience and are regularly updated.

Relevant Standards in the Higher Education Standards Framework (Threshold Standards)

Part A, Section 2.2, Diversity and Equity, which set out three broad requirements that apply to providers and courses of study:

1. Institutional policies, practices and approaches to teaching and learning are designed to accommodate student diversity, including the under-representation and/or disadvantage experienced by identified groups, and create equivalent opportunities for academic success regardless of students' backgrounds.
2. Specific consideration is given to the recruitment, admission, participation and completion of Aboriginal and Torres Strait Islander peoples.
3. Participation, progress, and completion by identified student subgroups are monitored and the findings are used to inform admission policies and improvement of teaching, learning and support strategies for those subgroups.

Part A, Section (2.3) within the Learning Environment domain. The Standards encompass (paraphrased):

- 2.3.1 avenues and contacts for support for students if needed
- 2.3.2 availability of specific types of personal support services
- 2.3.3 ensuring that support services offered reflect the needs of student cohorts
- 2.3.4 promotion of a safe environment
- 2.3.5 management of critical incidents.

An additional reporting requirement will only add to the already heavy regulatory burden placed on providers. Of course, if the Department believes the standards are insufficiently clear to provide the assurances it needs in relation to student support, the standards themselves could be updated to achieve this. The Department will still use its existing authority, when necessary, to seek information and investigate potential non-compliance, which can also apply to these requirements.

Implementation of *Support for students policies*

To ensure meaningful measures are in place, it will require time for universities to consult internally and with key stakeholders. Although HE providers are likely to have existing policies that largely give effect to the intended support for students, it will be important to have time to analyse new requirements in detail, and take the time needed to update policies in ways that are likely to be most effective for their particular cohorts. Importantly, HE providers will need time to undertake any process and IT system improvements implied through the policy change. Without allowing time for smooth implementation, HE providers run the risk of short-term confusion rather than a smooth uplift in student support.

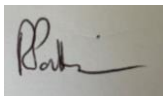
Swinburne supports the Higher Education Support Amendment (Response to the Australian Universities Accord Interim Report) Bill 2023 that is currently on the floor of Parliament, however we are disappointed that the passage of the Bill is occurring at the same time that feedback is being sought on this important consultation paper. It would have been beneficial for HE providers and stakeholders to have sufficient time to provide feedback on draft guidelines before this Bill is passed.

With both the above points **Swinburne recommends that HE providers make best endeavours to meet the requirements of the guidelines in 2024 but are given until the start of the 2025 academic year to fully meet the requirements of the guidelines.** Preparing and publishing *Support for student policies* will be

reasonably straightforward, but it will be the internal processes, including IT system changes and reporting to meet the requirements that will take time.

Swinburne again wants to commend the Universities Accord panel and Minister for Education in taking strong action to immediate extension of demand-driven funding to metropolitan First Nations students and end of the 50% pass rule that greatly disadvantaged students from equity groups. Both these measures will go a long way in boosting participation and support to those who will now have an opportunity to gain an education and eventual bright future in the workforce.

Yours sincerely



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