

Department of Education consultation on the *Support for Students Policy: Guidelines Consultation Paper*

15 September 2023

The Australian Technology Network of Universities (ATN) welcomes the opportunity to provide feedback to the Department of Education ('the Department') on the *Support for students policy: Guidelines Consultation Paper* ('the consultation paper') which is part of the proposed priority actions outlined in the Australian Universities Accord Interim Report and the Higher Education Support Amendment (Response to the Australian Universities Accord Interim Report) Bill 2023 ('the Bill').

Several ATN member universities are making individual submissions to this consultation paper with in-depth responses to the nine questions posed. ATN's submission should be read in conjunction with these individual submissions which address the practical aspects of delivering student support in our universities with their own unique and diverse cohorts.

As ATN outlined in our submission to the Senate Inquiry into the Bill¹, we are pleased that the Accord Panel and the Government have placed equity at the heart of their policy thinking for the future of Australia's post-secondary education system. ATN will continue to strongly advocate for and provide policy ideas to the Accord process because we believe that Australia will be better served if we move to a system of universal access to post-secondary education with equity central to the policy design. We also believe that equity and excellence are intrinsically linked and the Accord is an opportunity to better enshrine this approach in our post-secondary education system.

ATN has led the call for the removal of the 50 per cent pass rule and the extension of the demand driven system to all First National people since the release of the Job-ready Graduates package of reforms in 2020. The achievement of these changes through this Bill will make an immediate impact on some of our most disadvantaged students.

ATN universities believe that while the policy intent is laudable, the proposed approach in the *Support for students policy* is overly prescriptive for universities who already have an existing sophisticated policy and practice ecosystem to deal with student progress in place. We propose the following recommendations to improve the approach outlined in the consultation paper which will help balance the impost on institutions and achieving the Government's desired policy intent.

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https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Education_and_Employment/UniversitiesAccordAmend/Submissions

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Recommendations

ATN recommends that:

1. The Department suspend compliance associated with the *Support for students policy* until further and more comprehensive consultation with the sector has taken place;
2. Consideration is given to the overall regulatory impost these measures place on an already financially and resource constrained sector;
3. Consider what mechanisms are already at the Commonwealth's disposal to achieve the policy intent outlined in the Bill and these Guidelines, noting the requirements by universities to provide real-time reporting on student enrolment, progression and completion is already required through the *Higher Education Standards Framework (Threshold Standards)* administered by the Tertiary Education Quality and Standards Agency (TEQSA); and
4. A re-worked *Support for students policy* should be co-designed with the sector and:
 - a. Adhere to the principle of risk-based regulation;
 - b. Better define the roles of the Department and TEQSA;
 - c. Streamline timely data collection and reporting; and
 - d. Be responsive to the needs of cohorts, noting that a significant number of students are non-school leavers.

Observations

In our submission to the Senate Inquiry on the Bill, we highlighted the fact that all higher education providers are currently required to have in place processes and assistance to identify students at risk of falling behind and helping them to succeed.

TEQSA already administers the Threshold Standards which requires universities to have processes that identify students at risk of unsatisfactory progress and provide support to students to ensure they have equivalent opportunities to transition into and progress through their course, irrespective of their education background. As has been argued by ATN members in their individual submissions to this consultation paper, the Threshold Standards provides sufficient guidance to the sector and the National Code responds to different policy challenges associated with international education.

ATN supports the Minister for Education's request that the Higher Education Standards Panel consider the effectiveness of the current Threshold Standards in supporting students and advise what can be done to improve the standards currently in place.

We believe this is an important first step before the Department considers development of revised Guidelines. ATN have not supported the proposed inclusion of section 19-43 in the *Higher Education Support Act* to create this new regulatory system.

ATN would welcome the opportunity to work closely with the Department on developing a new or refined approach in line with our recommendations and the further comments made by ATN member submissions.

For further information, please contact the ATN Executive Director, info@atn.edu.au