

Response to the Support for students in the Higher Education Standards Framework Discussion Paper

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ABOUT THE REGIONAL UNIVERSITIES NETWORK

The Regional Universities Network (RUN) welcomes the opportunity to make a submission to the "Support for students in the Higher Education Standards Framework (Threshold Standards) Discussion Paper".

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.

OVERVIEW

RUN believe that the Threshold Standards as fit-for-purpose in relation to support for students. This belief is consistent with the Review of the Impact of the Tertiary Education Quality Standards Agency (TEQSA) Act on the higher education sector.¹

When thinking about the Threshold Standards it is pivotal to remember that TEQSA is not a dispute resolution body for individuals. It is also important to remember that TEQSA is limited by its governing act in terms of the resolution powers that it can provide.

RUN would like to emphasise that the current review of the Higher Education Standards Framework is occurring after the introduction of the Support for Students Policy Guidelines. The introduction of a set of Guidelines prior to a comprehensive and consultative review of the Threshold Standards is far from best practice. Such a course of action is likely to increase unnecessary regulatory burden (including duplication of reporting) upon providers, not yield beneficial outcomes for students and tertiary education providers, and likely to increase confusion about the clear roles of regulatory agencies and agreed standards.

RUN supports the submission from Universities Australia.

¹ A review of the Impact of the Tertiary Education Quality and Standards Agency Act 2011, accessed at: <https://www.education.gov.au/quality-and-legislative-frameworks/review-impact-teqsa-act-higher-education-sector>

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THRESHOLD STANDARDS

Q1: Do the Threshold Standards sufficiently describe what quality providers should be doing to support student retention, completion and success, including students from under-represented groups, and with regard to avoiding unnecessary debt?

Yes, the Threshold Standards sufficiently describe what providers should be in doing in relation to ensuring students are supported to succeed at their studies. Further, the quality of preparation, planning and alignment to the Threshold Standards is fundamental to the operations of university senior management, and university boards.

As outlined in the discussion paper, the Threshold Standards are minimum acceptable requirements for higher education providers and are designed to accommodate the diversity of higher education providers. The requirements of the Threshold Standards are not restricted to a single standard, but can be found across multiple standards. Providers who meet TEQSA's reregistration requirements are therefore deemed quality providers, and any suggestion to the contrary undermines confidence in Australia's high quality higher education providers.

It is important to note that issues of student success also relate to affairs beyond the scope of higher education providers and the Threshold Standards such as personal circumstances, and structural issues (e.g., poor or inconsistent internet access, or lack of childcare).

Higher education providers are rightfully concerned about the different interpretation of 'minimum standards' being imposed upon the sector and the inconsistencies inherent in the current approach of introducing policy that is in excess of the Threshold Standards. For example, the new minimum standards expressed through the Support for Students Policy Guidelines and the proposed National Action Plan to address gender-based violence in higher education. These policy initiatives would have been best placed within the existing regulatory mechanisms, i.e. the Threshold Standards.

Clarity in what constitutes a 'minimum standard' must be reached and consistency between government decisions is essential for providers to operate and to support students and staff. To provide sufficient and consolidated requirements that take account of the existing TEQSA guidance notes, a single set of standards that is administered by the sector regulator (TEQSA) must be established.



Q1a: How do the Threshold Standards guide institutions' provision of support for students?

The Threshold Standards have three foundational principles:

- the principle of regulatory necessity,
- the principle of reflecting risk, and
- the principle of proportionate regulation.

The Threshold Standards provide a framework for providers to develop policies, procedures, and governance structures. Providers meet the prescribed benchmarks and respond to community, student, and stakeholder needs with autonomy. The Threshold Standards should not dictate a uniformed or overly prescribed approach to regulation.

As such, the Threshold Standards are implemented in a variety of ways to meet the needs of each provider. TEQSA provide a range of supportive guidelines to support the sector in interpreting how to apply the Threshold Standards. These guidelines outline what TEQSA will look for during an assessment, investigation, or registration renewal process. It would not be viable for the Threshold Standards to list all expected standards for all students especially as student requirements and needs are so diverse. Universities therefore create and implement a variety of university specific policies to meet the needs of their students and the requirements of the Threshold Standards.

Q1b: What drives institutions to make improvements to the support provided to students?

Universities have a commitment to ensuring their students succeed both academically and non-academically during their time at university. This commitment is also underpinned by the contents of university governing acts.

The sector also provides a range of opportunities for institutional sharing and promoting of good practice, building upon the research and knowledge in the sector about student success and the good will of institutions and academic and professional staff to improve student outcomes.

Q1c: Are the requirements of the Threshold Standards sufficient for addressing the support needs of all students, including those from under-represented groups?

The requirements of the Threshold Standards are sufficient for addressing the support needs of all students, including those from under-represented groups because the Threshold Standards ensure that all students are treated equally. Unsurprisingly, universities therefore ensure that all students are provided with the support they need to succeed at their studies. While universities may run targeted support mechanisms for certain cohorts of students, the Threshold Standards are not the place to mandate cohort specific standards.

RUN and our members are unaware of any evidence that suggests that the Threshold Standards are not fit for purpose in ensuring providers are providing adequate support to all students.

IMPLEMENTATION OF THE THRESHOLD STANDARDS

Q2: Are higher education providers appropriately implementing the Threshold Standards?

TEQSA undertakes a risk-based approach to regulating the sector. This reflects both the necessity for provider flexibility – allowing providers to respond to their unique circumstances while setting standard and reasonable expectations – and the importance of addressing issues or concerns at an institutional level.

Since the establishment of TEQSA, few providers have had significant conditions imposed. In the rare case where a condition has been imposed, the individual provider has addressed the issue. This is effective risk-based and proportionate regulation. This history demonstrates that universities are appropriately implementing the Threshold Standards, and the regulator is effectively regulating the sector. It is in the interest of higher education providers to continuously improve and respond to changing social, technological, and cultural needs and expectations of staff, students, and their local and regional communities.

Q2a: What mechanisms are used to embed the Threshold Standards into institutional practice, particularly in relation to student support?

The Higher Education Standards Framework provides the starting point for institutional Academic Quality policy and practice. Universities utilise a range of mechanisms to ensure the Threshold Standards are implemented into institutional practice. Universities ensure governance structures are in place to ensure compliance with legal and regulatory requirements, including embedding the requirements into relevant policies, procedures, frameworks, and tools as well plans, processes and day to day activities including support services.

Q2b: Have institutional efforts to improve student retention, completion and success highlighted any challenges for implementing the Threshold Standards? If so, what?

The Higher Education Standards Framework is not optional. Higher education providers must comply with the Threshold Standards, and currently implement a range of support services dedicated to supporting students to succeed in their studies. These support services vary greatly throughout Australia and are appropriate to the circumstances and need of the provider's students. RUN does not believe that improving student support services, for both student retention, completion, and success have highlighted any challenges in implementing the Threshold Standards.

Q2c: Should the Higher Education Standards Framework include expectations for sharing good practice?

No. It would not be appropriate for the sharing of good practice to be a regulatory requirement or a requirement for accreditation/re-accreditation. The sharing of good practice is just that, a practice and is no way a measure of a provider's activities, nor quality.

At present universities undertake a variety of good practice sharing, including participating with TEQSA's Higher Education Integrity Unit.



STUDENT PROTECTIONS AND SUPPORT

Q3: Do students know what protections and support are available to them, and are they adequate from a student point of view?

Universities publish their policies and procedures so that all students and staff are able to access them. This helps students understand their responsibilities as well as ensuring that the processes of universities are understood. Universities provide extensive information what protections and support are available to students on their webpages. This information is shared with all students, especially during student orientation periods. Each university has a dedicated team to provide ongoing messaging to students about various support services and other important information.

While universities provide information to students through a range of communication channels, students – at the start of their university life and for each subsequent year – acknowledge their own responsibility in being informed of this information and their responsibility in utilising this information when appropriate. This position reflects the importance of student autonomy in decision making and is an important part of university learning.

Q3a: Do the Threshold Standards provide an adequate level of support and protection for all students? What, if any, changes to the Threshold Standards would improve support provided to students in higher-risk categories?

Yes, the Threshold Standards provide an adequate level of support and protection for all students. Universities have acts and University Councils, and in some cases have Student Charters, which are tailored to each university. These actively manage and set out the expectations of students, and of providers. As noted previously, the approaches taken by higher education providers varies greatly and is suited to the needs of their local communities and student and staff cohorts.

Higher education providers are required to give advice regarding, and communicate, the availability of services to students. The process of sharing information to students occurs at all stages of the student life cycle. Universities recognise the autonomy of individual students and the responsibility of students to be self-informed. This includes students acknowledging that they have read and understood their obligations to the university, as well as to complete tasks assigned to them by the university to assist them in their learning, university experience, and student wellbeing.

It should be noted however, that all universities have policies and measures in place to identify students at risk of non-completion, including those who have disengaged from their studies. Universities have proactive mechanisms in place to contact those students to offer them support.



Q3b: In addition to providing support, what do institutions do to assure themselves that their students are aware of the available supports and can access them when needed?

All RUN universities have proactive methods for identifying students at risk of not progressing with their studies. This proactive approach includes providing students with guidance, referrals to support services and academic advice. Additional measures include:

- Reporting to Academic Board and management committees on retention and completion rates
- Student representation on governance and management committees to ensure feedback on institutional approaches to student support and their awareness of that support
- Monitoring of websites and information provided to students
- Monitoring of support services data to understand awareness of services and the support service information sought
- Relationships with Student Unions who provide regular feedback about any concerns that students may have in relation to awareness of supports available
- Orientation activities including a process for review and feedback from students.
- Monitoring of complaint services feedback to reveal where students are not aware of support services
- Data from feedback surveys.

Universities have dedicated websites that provide links to all university support services consistent with student agency and autonomy.

Q3c: Have you identified recent trends or specific areas of concern in student experiences of support that have implications for the Threshold Standards?

The below are two trends in student demographics that are having implications on student experiences of support:

1. *The increase in fractional enrolments.*

The average student load among domestic students has slowly but consistently declined from around 0.70 Equivalent Full-Time Student Load (EFTSL) in 2016 to around 0.65 EFTSL in 2022. This places an additional financial burden on universities in maintaining student support services. Student support services such as counselling, student advising, etc. are typically available on a per enrolment basis, while funding is on a per EFTSL basis.

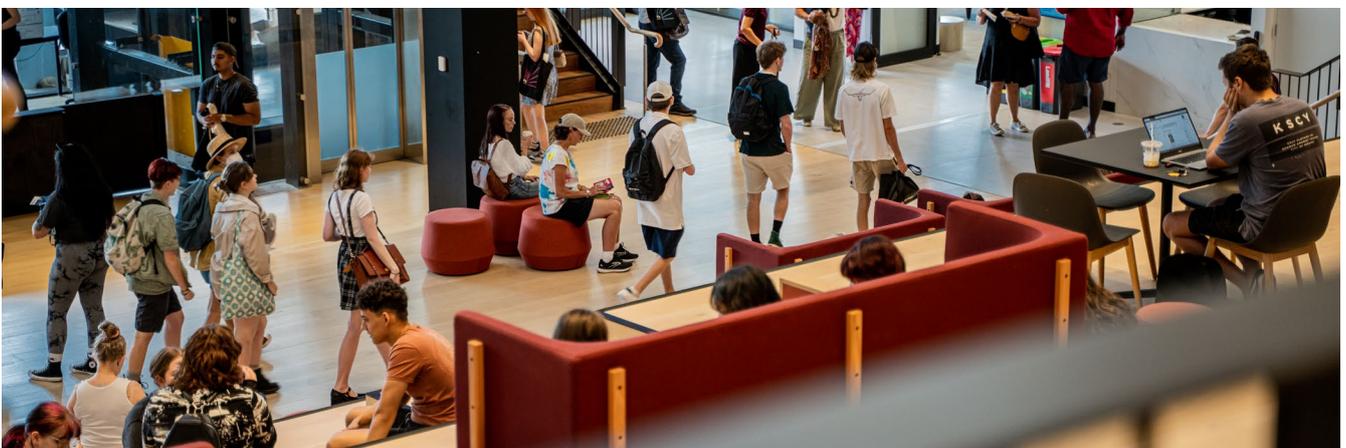
This burden is not equally distributed across universities with the average EFTSL in regional universities being 0.55. Therefore, regional universities provide support services for more students with the same funding as other universities.

2. *The increase in online enrolments.*

The proportion of students attending fully “on-campus” study has declined significantly with “internal” mode of attendance dropping from 72 per cent of enrolments in 2016 to 52 per cent in 2022.

Providing students with engagement opportunities is particularly challenging in this regard. While TEQSA guidance notes around wellbeing and safety note that there may be differences in the way in which services are provided to students according to mode of attendance, there is little recognition of the challenges involved in delivery support services remotely, particularly the challenges around proactive identification and support for mental health issues and the challenges of ensuring a safe environment virtually.

Both are external factors beyond the scope of universities to control. These changes are tied student support funding issues. Universities carry the consequences of these issues and work to resolve them whenever and wherever possible to support students to access and succeed at university. However, there is ultimately a limit to which universities can operate without appropriate government and other stakeholder support.



OPPORTUNITIES FOR IMPROVEMENT

Q4: What can be done to improve the Threshold Standards, their implementation and higher education providers' compliance with these Standards?

The Thresholds Standards are fit for purpose. Evidence suggest that higher education providers are implementing the Threshold Standards appropriately and are being deem compliant with these standards. There may be occasional instances where the Threshold Standards can be open to interpretation which could lead to a misalignment of expectations between providers, assessors, and government, especially in relation to the role of TEQSA, and the powers afforded to TEQSA via their Act.

Q4a: Are there any areas in relation to language, clarity, structure, format or currency where you believe the Threshold Standards could be improved?

Predominately no. The Threshold Standards have stood the test of time, however like all documents they are a product of their time. There could be minor tweaks to language to remain up to date with the currently used nomenclature.

Q4b: Are there areas of inconsistency, overlap or duplication in existing regulatory and compliance requirements for the provision of support to students?

There is a need for a review of sector regulation to reduce overlap between key governing pieces of legislation. Each of the Higher Education Standards Framework, the Higher Education Support Act, the Education Services for Overseas Students (ESOS) Framework and their supporting legislative frameworks require providers to have, and in some elements report on initiatives that provide support for students. This creates an additional burden on providers to ensure that they are meeting the requirements of three separate yet related pieces of legislation that are all aiming to achieve the same thing, ensuring providers have support arrangements available and applied to students when and if needed.

There could be additional clarity provided on the roles and responsibilities of sector regulators and the Department of Education especially in relation to the support of students. At present, there is increasing overlap and duplication which is creating unnecessary reporting instead of empowering universities to support students.

Q4c: Do you have any other points you would like to raise about the Threshold Standards or their implementation in relation to student support?

The regulatory uncertainty and inconsistency in transparent policymaking is causing confusion, overlap, and disruption within the sector that also has implications for student wellbeing. The creation of reporting heavy interventionist policy is not consistent with the regulatory framework, of which the Threshold Standard are a key component, and that has well-served Australia's higher education system and students.