

Council of Australian Postgraduate Associations (CAPA)

**Submission to the
Senate Inquiry into the Higher Education Legislation
Amendment (Student Services and Amenities, and
Other Measures) Bill 2009**

February 2009

Summary of Recommendations

Recommendation 1: That the following subsection be struck from the Bill:
19-67(3) However, the Student Services, Amenities, Representation and Advocacy Guidelines cannot require a provider to fund an organisation of students, or of students and other persons.8

Recommendation 2: That the following subsection be struck from the Bill:
19-67(4) Subsection 19-65(1) does not apply in relation to the Student Services, Amenities, Representation and Advocacy Guidelines.9

Recommendation 3: That the Bill and Guidelines be amended to enable 100% of revenues from the proposed fee to be independently administered by student associations..... 11

Recommendation 4: Where 100% of the fee is not independently administered by student associations, a minimum proportion of 25% of the fee revenues must transferred to representative student associations on a per-head basis (dedicated for postgraduate and undergraduate services and representation respectively). 11

Recommendation 5: That the scope provided by the Bill and Guidelines ensures that all revenues from the proposed fee are used in support of student services and representation consistent with the original intent of the legislation. 12

Recommendation 6: That the guidelines be amended to provide for the full range of support activities provided by postgraduate associations, in lieu of the proposed fee being properly administered on their members' behalf..... 13

Recommendation 7: That a per-head allocation of fees collected be dedicated specifically for services and representation for undergraduate and postgraduate students respectively. 13

Recommendation 8: Providers must account transparently for all fees levied in support of student services, in the case of both international and domestic students..... 14

Recommendation 9: Where student services and amenities fees are not directly administered by independent student associations, elected representatives from student organisations should be required to “sign off” on the reconciliation of the expenditures to ensure adequate standards of reporting. 14

Compiled with the assistance of the staff and office bearers of the Council of Australian Postgraduate Associations (CAPA) and its affiliated member organisations.

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The Council of Australian Postgraduate Associations (CAPA) is the national representative body for Australia's 278,257 postgraduates, including 50,140 research and 228,117 coursework students.¹ The following is in response to the invitation for submissions to the *Inquiry into the Higher Education Legislation Amendment (Student Services and Amenities, and Other Measures) Bill 2009* currently before the Senate.

1 Background on the Proposed Bill

As Senators and members of the House of Representatives will attest, 2008 was very much a year of review. There were three major reviews of higher education: The "Bradley" Review of Australian Higher Education, The Innovation Review, and the House of Representatives Inquiry into Research Training and Research Workforce Issues in Australian Universities.² There was also, in effect, a fourth review, in the form of the Federal Government's Discussion Paper *The Impact of Voluntary Student Unionism on Services, Amenities and Representation for Australian University Students*.³

Through these reviews, the social and economic importance of a quality Australian higher education system was clearly established. Capacity building, participation and equity were key themes to emerge in the course of these reviews, as was the central importance of sustainability for Australian higher education into the future. Together, these reviews outline what it takes to sustain a world class higher education system: quality and sustainability in teaching and learning, research and innovation, and in student services and representation.

The aim of this Inquiry is to ensure the availability of quality student services and representation. From a government, institutional and student perspective, there are at least three reasons why this is an important goal:

- 1) Ensuring a quality student experience
- 2) Ensuring adequate support services for students
- 3) Maintaining effective measures for improvements in quality

¹ Department of Education Employment and Workplace Relations (DEEWR) (2008c). *Students 2007 (full year), Selected Higher Education Statistics*. www.deewr.gov.au.

² Department of Education Employment and Workplace Relations (DEEWR) (2008b). *Review of Australian Higher Education Final Report*. Eds. Bradley, D., Noonan, P., Nugent, H. & Scales, B. Commonwealth of Australia, Canberra, ACT. December 2008: <http://www.deewr.gov.au/HigherEducation/Review/Pages/ReviewofAustralianHigherEducationReport.aspx>; Cutler, T. (2008). *Venturous Australia*. Cutler & Company, Melbourne Vic: <http://www.innovation.gov.au/innovationreview/Pages/home.aspx>; House of Representatives Committee on Industry Science and Innovation (2008). *Building Australia's Research Capacity*. Parliament of Australia, Canberra, ACT. December 2008: <http://www.aph.gov.au/house/committee/isi/research/report.htm>.

³ Department of Education Employment and Workplace Relations (DEEWR) (2008a). *The Impact of Voluntary Student Unionism on Services, Amenities and Representation for Australian University Students (Discussion Paper)*. Commonwealth of Australia, Canberra, ACT. February 2008: <http://www.dest.gov.au/NR/rdonlyres/B5D454AC-1CBE-4E43-B3EB-4B6C3DDE5C56/20164/DiscussionPaperImpactofVSUFebruary2008.pdf>.

1.1 Ensuring a quality student experience

Participation in higher education should be understood in the fullest possible sense. This means supporting participation for individuals beyond simply gaining entry to an institution of higher learning. Encouraging application and enrolment from as diverse a group as possible is important, but responsibilities in support of participation do not end at the point of commencement.

Graduating with a tertiary degree should amount to more than a transaction where qualifications are conferred in exchange for fees. Students should have opportunities for adequate participation in higher education during the course of their degree.

Submission to the Review of Australian Higher Education
Council of Australian Postgraduate Associations⁴

In participating in higher education, students should reasonably expect to get out of it more than they put in. Institutions and government also have an interest in maintaining a quality student experience, not least in ensuring that our universities remain attractive destinations for prospective students from overseas. If we want to sustain a world class higher education system, we need to be clear that world class student support services and representation form part of that goal.

One of the recognised indicators of a quality student experience is that of *student engagement*. The question of student engagement and how it can be improved is drawing increasing attention. To date, most of this discussion has focussed on student engagement in teaching and learning, but student engagement in a broader university experience is also becoming recognised as increasingly important.⁵

Student engagement activities also build a sense of collegiality, an area where universities have performed consistently poorly, especially in regard to research students.⁶ Being actively involved in an academic community not only provides students with important social support, but can also contribute to the cross-fertilisation of ideas and create opportunities for collaboration, supporting student retention, significantly improving the quality of the research environment, and significantly improving the quality of the student experience.

One of the unfortunate characteristics of postgraduate education is the risk of isolation. Where inadequate support services are in place, or where institutions fail to ensure reasonable measures to support a collegial research environment, isolation remains a significant risk factor in postgraduate education: personally, professionally and academically.

⁴ Palmer, N. (2008b). *Submission to the Review of Australian Higher Education*. Council of Australian Postgraduate Associations, Carlton, VIC: www.capa.edu.au. (p.9)

⁵ Australian Council for Educational Research (ACER) (2008). *Attracting, Engaging and Retaining: New Conversations about Learning*. Australian Council for Educational Research (ACER), Melbourne, VIC.

⁶ Lane, B. (2008). Research ambience askew say postgraduate students. *The Australian*. Sydney, Australia, September 10: <http://www.theaustralian.news.com.au/story/0,,24320959-12332,00.html>.

Table 1: Providers of support activities identified by PhD students⁷

Training type/providers	Department / faculty	Graduate school	PG student association	Professional organisation	Other
Seminar series	69	13	7	6	5
Social activities	45	4	26	6	19
Discussion group	60	11	8	7	14
Electronic network	27	11	12	23	27
Writing group	33	29	16	3	19
Other doctoral group	40	11	11	7	31

Postgraduate associations play an important role in creating a sense of community for all higher degree students. Postgraduate associations organise programs and events, as well as providing their own academic and professional development programs. Despite the impact of “VSU” on postgraduate-specific services and representation, many postgraduate associations continue to offer advocacy services for students, and assist in resolving student concerns about all aspects of their candidature.⁸

Some postgraduate associations still offer access to resources like quiet study facilities after hours. High demand for facilities like this has seen students (mostly coursework postgraduates) camped-out in stairwells just to have somewhere quiet to work. Postgraduate associations fill the gaps across a range of services, all with the aim of helping people cope with postgraduate study and the unique challenges it presents.

Services and activities in support of student engagement need to be effective and credible from students’ point of view. Obviously, the best way to achieve this is for students themselves to administer these programs.

1.2 Support services for students

There is no clear line between activities in support of a quality student experience and support services for students. In many cases these are one and the same. Support services are central to efforts in retaining and supporting candidates through to the successful completion of their degree. The importance of improving student retention and completion rates featured prominently in the Final Report of the “Bradley” Review of Australian Higher Education.⁹

⁷ Pearson, M., Cumming, J., Evans, T., Macauley, P. & Ryland, K. (2008). Exploring the extent and nature of the diversity of the doctoral population in Australia: a profile of the respondents to a 2005 national survey. Presented at *Quality In Postgraduate Research Conference: Research Education in the New Global Environment*. Adelaide (in press): www.qpr.edu.au. (p.22)

⁸ Skinner, S., Chenco, C. & Palmer, N. (2007). *The Impact of VSU on Postgraduate Students*. Council of Australian Postgraduate Associations, Carlton, VIC: www.capa.edu.au; Palmer, N. (2008a). *The Impact of VSU on Services, Amenities and Representation for Australian Students (Response to Discussion Paper)*. Council of Australian Postgraduate Associations, Carlton, VIC: www.capa.edu.au.

⁹ Department of Education Employment and Workplace Relations (DEEWR) (2008b). *Review of Australian Higher Education Final Report*. Eds. Bradley, D., Noonan, P., Nugent, H. & Scales, B. Commonwealth of Australia, Canberra, ACT. December 2008:

Academic advocacy and advice sits alongside health and welfare services as an important part of the duty of care obligations of universities. Students need somewhere to go if they have questions or concerns, especially where they may lead to a potential grievance or dispute with the university.

Many postgraduates risk falling at the last hurdle due to personal, financial or academic problems. With the sole aim of supporting students, academic advocacy and support has always been the “core business” of postgraduate associations. There are many instances where students teetering on the brink have been supported by their postgraduate association to continue in their studies and successfully complete their degree.

As noted in CAPA’s response to the 2008 Discussion Paper, there is often confusion around the role of advocacy and the meaning of the term “advocate”.

Trained advocates (as opposed to student representatives or volunteers) have expertise in advising students and, potentially, mediating students’ concerns where problems or potential grievances arise. Trained advocates specialise in seeking to resolve situations that often risk escalating into conflict and potential litigation in a professional and non-adversarial manner. They are experts on university policy and procedure, often have extensive networks among university administration and academic staff, and work for students both individually and collectively in helping ensure a quality university experience.

“VSU” Discussion Paper response
Council of Australian Postgraduate Associations¹⁰

The important difference between health and welfare services and academic advocacy and advice is that while the first two *may* be provided by the university and still be effective, academic advocacy cannot.

Advocates must be impartial and separate from the university if students are to feel comfortable approaching them, and if they are to advise and advocate for students’ interests in good faith. University employed advocates face a disincentive to “advocate” on the broader issues beyond resolving problems on a case-by-case basis, especially where their employer may appear uninterested in hearing about problems elsewhere in the university.

<http://www.deewr.gov.au/HigherEducation/Review/Pages/ReviewofAustralianHigherEducationReport.aspx>.

¹⁰ Palmer, N. (2008a). *The Impact of VSU on Services, Amenities and Representation for Australian Students (Response to Discussion Paper)*. Council of Australian Postgraduate Associations, Carlton, VIC: www.capa.edu.au.

1.3 Quality assurance

There are two components of independent representation and advocacy: firstly the advocacy services available to individual students, and secondly the representation function that in effect bridges the quality assurance cycle between students, student advocates, student representation and university policy, procedures, administration and management. Two of the most significant consequences of VSU for postgraduate students are the loss of funding to support dedicated advocacy services for postgraduate students, and the threat to the organisational independence of postgraduate student organisations.

From *The Impact of VSU on Postgraduate Students*
Council of Australian Postgraduate Associations¹¹

Students enrolling at an Australian Higher Education Provider have a legitimate expectation of receiving a quality university experience. Sustaining quality in higher education means ensuring that you continue to improve on what you do; that you recognise and identify your strengths, and promote them – and that you adopt an open approach to identifying and clarifying your weaknesses.

There is no clear line where academic advocacy ends and efforts in support of continuous improvement and quality assurance begin. This is largely thanks to the ability independent student associations have in integrating individual and systemic advocacy, through ensuring the link between academic advocacy and student representation is maintained.

Elected student representatives participate on academic committees and work with faculties, administration and schools of graduate studies in providing the university with important feedback on the postgraduate experience, in support of retaining and supporting postgraduates at their institution.

Institutions have an interest in ensuring the link between academic advocacy and independent representation is maintained, especially if they are to genuinely embrace the notion of continuous monitoring and improvement of quality (as they are often heard to profess when the Auditors come to visit).

Under VSU, student representation has been seriously undermined due to the impact on staff and resources for student organisations, and this is especially the case for postgraduate students. Individual postgraduates still seek to engage with their university and represent postgraduate interests, but on some campuses must do so without any form of support at all, and have even been denied access to academic advocacy staff where they seek to develop an informed point of view. They therefore have no means at all to engage with postgraduates more broadly, and no means to identify what the issues really are on their campus outside of their own experience as a student.

¹¹ Skinner, S., Chenco, C. & Palmer, N. (2007). *The Impact of VSU on Postgraduate Students*. Council of Australian Postgraduate Associations, Carlton, VIC: www.capa.edu.au. (p.20)

Genuine representation requires an independent student voice, and is most effective when supported by the provision of independent academic advocacy as a service. Students offer their time (often on a volunteer basis) to represent students' interests by seeking to engage other students on issues, helping organise the activities of student associations, and engaging with their university through committee participation, formal submissions and other means. A single isolated student simply sitting on a committee however has a very limited ability to consult with students more broadly, often has a limited understanding of broader relevant issues, and would have no access to information on the individual or systemic problems students may actually be encountering.

Academic advocacy services provided by independent student organisations are by far the best means of informing such representation. Effective student representation is broadly informed by academic advocacy "caseload" trends and strict protocols are normally in place to prevent the release of information on specific cases. In this way student representatives can be supported to have an informed opinion on the issues that count.

From Response to the VSU Discussion Paper
Council of Australian Postgraduate Associations¹²

Universities have obligations in regard to maintaining standards and in developing the means for seeking continuous improvement. Genuine student participation in quality assurance must be informed and supported by the nexus between independent advocacy and representation.

Student participation that is not able to offer an informed view on the interests and needs of students, or is not free to speak freely on their behalf, cannot constitute genuine representation. Academic advocacy that simply acts to resolve individual problems on a case-by-case basis without seeking to inform efforts to improve universities' practices through independent representation does not constitute genuine independent advocacy. The two may work separately, but they are only genuinely effective when combined. These are also functions that the university itself cannot adequately provide.

¹² Palmer, N. (2008a). *The Impact of VSU on Services, Amenities and Representation for Australian Students (Response to Discussion Paper)*. Council of Australian Postgraduate Associations, Carlton, VIC: www.capa.edu.au.

2 The Bill

The *Higher Education Legislation Amendment (Student Services and Amenities, and Other Measures) Bill 2009* ('the Bill') was introduced into Federal Parliament February 11th 2009, and is the principal matter before the current inquiry. CAPA would like to take this opportunity to bring specific provisions in the Bill to the attention of Senators, in order for them to make informed decisions in regard to the legislation currently under consideration. Proposed amendments to the Bill are included where appropriate.

2.1 Effect on the 2005 "VSU" amendments

CAPA would simply like to highlight to Senators that the force of amendments proposed in this Bill are to *modify* the existing constraints on higher education providers charging non-academic fees, and do not appear to "undo" the so-called "VSU" amendments to the *Higher Education Support Act* passed in 2005. Refer section 19-37 (page 3 of the Bill).

2.2 Constraining providers in their use of the fee

Subsection 19-38(3) of the Bill constrains higher education providers in the use of the proposed student services and amenities fee to the *Student Services and Amenities Fee Guidelines*. Although CAPA has clear reservations about the scope of the *Guidelines* as proposed, we endorse constraining providers in their use of fee revenue in support of appropriate student support services only. Refer subsection 19-38 (3) (page 5 of the Bill).

2.3 Ensuring adequate support for independent representation and advocacy

CAPA believes that student representation and academic advocacy can only be effective where it is truly independent, and that it cannot be truly independent where the university has discretionary control over 100% of student money under this fee. CAPA therefore proposes that the *Student Services, Amenities, Representation and Advocacy Guidelines* should be able to describe requirements on higher education providers in relation to a fixed amount or proportion of the Fee to be made directly available to organisations of students. CAPA therefore recommends that subsection 19-67 (3) be struck from the Bill currently under consideration.

Recommendation 1:

That the following subsection be struck from the Bill:

19-67(3) However, the Student Services, Amenities, Representation and Advocacy Guidelines cannot require a provider to fund an organisation of students, or of students and other persons.

2.4 Ensuring appropriate standards for student services, amenities, representation and advocacy for all students

CAPA commends the Government's development of the *Student Services, Amenities, Representation and Advocacy Guidelines*, and endorses the proposal that these form part of amendments to the Higher Education Support Act by way of legislative instrument.

There appears no justification however for these to be any less binding on higher education providers as a compliance requirement than other measures in this Bill, or in the Act.

CAPA therefore recommends that, unless there is any justifiable administrative purpose for the clause, subsection 19-67 (4) be struck from the Bill currently under consideration.

Recommendation 2:

That the following subsection be struck from the Bill:

19-67(4) Subsection 19-65(1) does not apply in relation to the Student Services, Amenities, Representation and Advocacy Guidelines.

2.5 Ensuring a compulsory student services and amenities fee does not become a financial burden or barrier to participation

CAPA endorses the creation of the SA-HELP financial assistance scheme to help ensure the levying of a compulsory student services and amenities fee does not become an unfair financial burden or barrier to participation for students. Refers Part 3-5 of the Bill.

3 The Guidelines

Draft Guidelines for Student Services, Amenities, Representation and Advocacy, and for the administration of the proposed Student Services and Amenities Fee were released by the Hon. Kate Ellis, Minister for Youth and Sport, February 19th, 2009.

The Guidelines form an important part of the legislation currently under consideration, as they describe limits on the use of any student services and amenities fees charged, while also establishing appropriate standards for student services, amenities, representation and advocacy.

While higher education providers are not compelled to charge a compulsory services and amenities fee under the bill, the guidelines and the Bill together constrain the purposes for which any such fees could be used.

CAPA has received a significant amount of feedback from postgraduates on the proposed fee guidelines. The majority of concerns expressed fall under the following headings:

1. The administration of the fee
2. The scope of the guidelines
3. Compliance conditions on providers

3.1 Administration of the proposed fee

3.1.1 The basic principle of a student services fee

There is an overriding principle at stake in the case of a services and amenities fee: Students are being asked to pay an additional fee - they are entitled to have a direct say in how their money is being spent.

Students are entitled to expect something concrete in return for the additional \$250 they may be asked to pay. They are entitled to know exactly where their money goes and direct the purposes for which it is used. The best way to achieve this is for independent student organisations to administer all funds under the proposed fee.

3.1.2 The Risk of undue influence

Murdoch University offers the most recent example of the temptation that control over funding offers universities in bringing undue influence to bear on student associations.¹³ Correspondence from the University's Chancellor to the Guild clearly threatened to withhold student funds collected under the proposed fee unless the Guild conformed with the university's wishes. This

¹³ A copy of the letter from the Murdoch University Chancellor to the Guild President is attached with this submission, and is also available at www.guild.murdoch.edu.au/resources/Letter%20to%20Guild.pdf.

was described in student feedback received by the Guild as “cash for no comment”.¹⁴

There is nothing in the Bill or Guidelines as proposed to prevent this kind of duress being exercised wherever universities exercise 100% of students’ funds from the proposed fee.

Recommendation 3:

That the Bill and Guidelines be amended to enable 100% of revenues from the proposed fee to be independently administered by student associations.

3.1.3 Ensuring adequate support for independent representation and advocacy

CAPA believes that student representation and academic advocacy can only be effective where it is truly independent, and that it cannot be truly independent where the university has discretionary control over 100% of student money under this fee. CAPA therefore proposes that the *Student Services, Amenities, Representation and Advocacy Guidelines* should describe requirements on higher education providers in relation to a fixed amount or proportion of the Fee to be made directly available to organisations of students on a per-head basis by broad level of course (undergraduate and postgraduate respectively).

Recommendation 4:

Where 100% of the fee is not independently administered by student associations, a minimum proportion of 25% of the fee revenues must be transferred to representative student associations on a per-head basis (dedicated for postgraduate and undergraduate services and representation respectively).

3.2 The scope of the Guidelines

3.2.1 The “displacement” effect

CAPA is concerned that the Guidelines allow significant expenditures from the fee on the part of the University, effectively “displacing” the ability of the fee to be administered in support of more student-centred activities. There are concerns in particular regarding the inclusion of “the provision of infrastructure (including new construction)” among allowable uses of the fee.

Importantly, these concerns centre around expenditure on areas not previously funded out of the student services fee.

¹⁴ Full details available at www.guild.murdoch.edu.au/your-guild/guildgagorder.

3.2.2 “Double-Dipping”

Concerns have also been expressed by postgraduates that the proposed fee guidelines may still allow universities to “double-dip” from revenue collected under the proposed scheme as well as from other funding streams to fund activities that may not be directly related to the purpose for which the fee was originally intended.

Academic and administrative costs are already funded from other revenue sources. CAPA is concerned that providers may seek to make up for revenue short-falls in other areas by dipping into students’ funds.

The purpose of the proposed fee is to sustain quality student services and representation that are over and above universities’ existing obligations and administrative requirements.

Recommendation 5:

That the scope provided by the Bill and Guidelines ensures that all revenues from the proposed fee are used in support of student services and representation consistent with the original intent of the legislation.

3.2.3 Activities under the Guidelines

Institutions of higher learning play an important role in the development of professional skills, and a broad range of professional capacities. They are also expected to foster and support public discussion and debate on the important issues of the day. They should be characterised by the preservation, transmission and extension of knowledge for its own sake, and the development of critical capacities in an environment of vigorous academic freedom.

Tertiary education is central to the continued development of a highly skilled workforce and makes a vital contribution to Australia’s economic development overall. We do, however, owe a responsibility to the community to have higher aspirations for higher education than simply sustaining a client-service model, preserving an industry in its own right with the aim only of satisfying labour market demand. Higher education in modern Australia must reflect the aspirations of a society and a nation that are both innovative and inclusive, and environment supportive of free and critical thought.¹⁵

Postgraduate associations have historically been a site of innovation in the development of programs and activities in support of students. Many of the skills and professional development initiatives now hosted by many graduate schools were originally developed by postgraduate associations, directly in response to needs identified among students.

¹⁵ Based on *The Place for Higher Education in Modern Australia* in Palmer, N. (2008b). *Submission to the Review of Australian Higher Education*. Council of Australian Postgraduate Associations, Carlton, VIC: www.capa.edu.au.

That postgraduate associations may no longer be able to be responsive to the interests and needs of their members in a regulated environment for student activity seems preposterous.

A range of student engagement activities currently supported by postgraduate associations appear to be precluded under the current Guidelines, including:

- Seminars, conference programs, awards programs and professional development events.
- Grants, bursaries and awards, including equity grants
- Professional, academic and social networking events
- Student equity initiatives

Recommendation 6:

That the guidelines be amended to provide for the full range of support activities provided by postgraduate associations, in lieu of the proposed fee being properly administered on their members' behalf.

3.2.4 Ensuring dedicated services and representation for postgraduate students

The introduction of the 2005 "VSU" amendments to the *Higher Education Support Act* (2003) has had a dramatic effect on the quality of, and access to, services and representation for postgraduate students. CAPA's 2007 report *The Impact of VSU on Postgraduate Students* revealed a significant decline in services and representation for postgraduates.¹⁶

CAPA, and its affiliated campus-based organisations, are instrumental in helping retain research students, through "filling the gaps" in the services and advice that institutions cannot, or do not, provide. Postgraduate students have bore the brunt of the impact of VSU. They have lost more dedicated facilities, services and support than any other group.¹⁷ There is nothing in the Bill or in the Guidelines as currently proposed to suggest that there will be adequate measures in place to address this.

Recommendation 7:

That a per-head allocation of fees collected be dedicated specifically for services and representation for undergraduate and postgraduate students respectively.

¹⁶ Skinner, S., Chenco, C. & Palmer, N. (2007). *The Impact of VSU on Postgraduate Students*. Council of Australian Postgraduate Associations, Carlton, VIC: www.capa.edu.au.

¹⁷ Palmer, N. (2008a). *The Impact of VSU on Services, Amenities and Representation for Australian Students (Response to Discussion Paper)*. Council of Australian Postgraduate Associations, Carlton, VIC: www.capa.edu.au.

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3.3 Reporting and compliance requirements in the administration of fee revenues

CAPA believes that any revenues for services, amenities and representation should be administered in line with best practice transparency, accountability and responsible financial management. Funds administration should be open to scrutiny both in terms of how those revenues are managed and also the purposes for which those funds are spent. The administration of student services revenues should maintain best practice reporting standards and be subject to independent audit.

It is also worth noting that the Commonwealth does not currently regulate International Student fees directly. This means that providers already can (and do) charge international students a compulsory amenities fee; this fee forms part of the fees already charged of international students. Providers must account for all fees they levy in support of student services, in the case of both international and domestic students.

Recommendation 8:

Providers must account transparently for all fees levied in support of student services, in the case of both international and domestic students.

Recommendation 9:

Where student services and amenities fees are not directly administered by independent student associations, elected representatives from student organisations should be required to “sign off” on the reconciliation of the expenditures to ensure adequate standards of reporting.

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Appendices

Appendix I: Correspondence from the Chancellor of Murdoch University to the Murdoch University Guild.