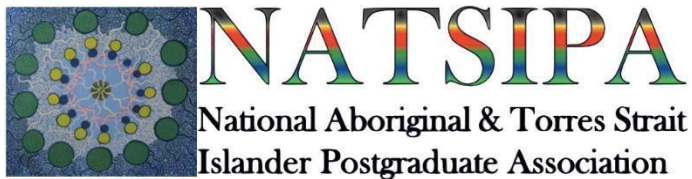


Council of Australian Postgraduate Associations (CAPA) and National Aboriginal and Torres Strait Islander Postgraduate Association (NATSIPA)

Response to Support for Student Policy Consultation Paper

September 2023



Compiled with the assistance of the office bearers of the National Aboriginal and Torres Strait Islander Postgraduate Association (NATSIPA) and Council of Australian Postgraduate Associations (CAPA) and its affiliated member organisations.

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Foreword

This is a joint submission of the Council of Australian Postgraduate Associations (CAPA) and the National Aboriginal and Torres Strait Islander Postgraduate Association (NATSIPA).

The Council of Australian Postgraduate Associations (CAPA) is the peak body representing the interests of the over 481,000 postgraduate students in Australia. We represent coursework and research, as well as domestic and international postgraduates. We are comprised of 28 university and campus based postgraduate associations, as well as the National Aboriginal and Torres Strait Islander Postgraduate Association (NATSIPA). CAPA carries out its mission through policy, research, and activism, communicating the interests and issues of postgraduate students to higher education stakeholders as well as Federal and State Governments, Opposition parties, and minor parties.

The National Aboriginal and Torres Strait Islander Postgraduate Association (NATSIPA) is the peak representative body for Aboriginal and Torres Strait Islander postgraduate students, representing almost 940 Aboriginal and Torres Strait Islander Higher Degree by Research (HDR) students and over 3600 Aboriginal and Torres Strait Islander postgraduate coursework students.

We thank the University Accords Panel for their efforts in putting together the Interim Report and the Department of Education for the opportunity to contribute to the Support for Student policy consultation paper.

Introduction

In our joint submission CAPA and NATSIPA have reflected on the consultation questions and propose the inclusion of a universal student support system that canvases the common needs all students should be provided during their studies. To supplement the differentiation of needs, additional sections should be added specifically to address the needs of international students, First Nations and those with disabilities where applicable. Doing so will minimise duplication of regulations which we hope will minimise the burden for providers and allow greater focus on supporting students as intended. We also recommend the Support for Student policy could include additional guidelines for a minimum resource guarantee for students commencing a research degree. Finally, we believe that the these guidelines need to be monitored regularly and the Quality Indicator for Learning and Teaching (QILT) survey could be adapted for this, but more importantly these policies need to be enforced with adequate penalties to ensure provider compliance at all times.

1. What practical considerations need to be taken into account in implementing the Guidelines?

The introduction of domestic student support guidelines should complement any existing guidelines for international students to minimise duplication of regulations over separate documents. It is worth considering a universal student support system that is common to all students with separate sections that may apply specifically to Aboriginal and Torres Strait Islander, domestic or international students. This could centralise the expectations to one regulatory document and minimise the administrative burden and cost on institutions.

2. Are there features of the Code that could also be applied to domestic student support and included in the Guidelines?

Numerous aspects of the Code of International Students would readily apply to domestic students. For example most institutions would already meet or practise above Standards 1-3 for domestic students. However, aspects of Standards 6 and 10 are where greater equity support for domestic students is needed.

Standards in the	Points that apply to both cohorts
<i>Standard 1: Marketing and Information Practices</i>	<ul style="list-style-type: none">- Ensuring providers do not provide misleading information featured in is applicable equally to both domestic and international students.
<i>Standard 2: Recruitment of an overseas student</i>	<ul style="list-style-type: none">- “Ensuring students are appropriately qualified for the course for which they seek enrolment, have the educational qualifications and work experience for the course.”- “Students must have sufficient information to enable them to make informed decisions about studying with their chosen registered provider in Australia.”
<i>Standard 3: Formalisation of enrolment and written agreements</i>	<ul style="list-style-type: none">- These standards for formalising enrolment of students through written agreements that “protect the rights and set out the responsibilities of each party, as well as the courses and related education services to be provided, tuition and non-tuition

	fees payable, and refund policies.”
<p><i>Standard 6: Overseas student support services</i></p>	<p>6.1 - support the ... student in adjusting to study and life in Australia [for domestics, this is applicable to relocation] by giving the ... student information on or access to an age and culturally appropriate orientation program that provides information about:</p> <ul style="list-style-type: none"> - 6.1.1 - support services available to assist ... students to help them adjust to study and life ... - 6.1.2 - English language and study assistance programs - 6.1.3 - any relevant legal services - 6.1.4 - emergency and health services - 6.1.5 -the registered provider’s facilities and resources - 6.1.6 - complaints and appeals processes as outlined in Standard 10 (Complaints and appeals) - 6.1.7 - requirements for course attendance and progress, as appropriate - 6.1.8 - the support services available to assist students with general or personal circumstances that are adversely affecting their education in Australia - 6.1.9 - services students can access for information on their employment rights and conditions, and how to resolve workplace issues, such as through the Fair Work Ombudsman. - 6.4 - provider must facilitate access to learning support services consistent with the requirements of the course, mode of study and the learning needs of overseas student cohorts, including having and implementing documented processes for supporting and maintaining contact with ... students undertaking online or distance units of study. - 6.5 - The registered provider must designate a member or members of its staff to be the official point of contact for overseas students. The student contact officer or officers must have access to up-to-date details of the registered provider’s support services. - 6.6 - The registered provider must have sufficient student support personnel to meet the needs of the overseas students enrolled with the registered provider. - 6.8 - The registered provider must have and implement a documented policy and process for managing critical incidents that could affect the overseas student’s ability to undertake or complete a course, such as but not limited to incidents that may cause physical or psychological harm. The registered provider must maintain a written record of any critical incident and remedial action taken by the registered provider for at least two years

	<p>after the overseas student ceases to be an accepted student.</p> <p>6.9 - The registered provider must:</p> <ul style="list-style-type: none"> - 6.9.1 - take all reasonable steps to provide a safe environment on campus and advise overseas students and staff on actions they can take to enhance their personal security and safety - 6.9.2 - provide information to ... students about how to seek assistance for and report an incident that significantly impacts on their wellbeing, including critical incidents - 6.9.3 - provide ... students with or refer them to (including electronically) general information on safety and awareness relevant to life in Australia. <p><i>Note: many of these standards are applicable to students that identify belonging to equity groups.</i></p> <p><i>This section is especially relevant to Aboriginal and Torres Strait Islander students - especially providing culturally appropriate orientation processes and clearly outline the support that is available through Indigenous centres on campuses as well as throughout the university, in a culturally appropriate way ensuring this is done by First Nations Peoples for the students.</i></p>
<p><i>Standard 10: Complaints and appeals</i></p>	<p>10.1 - The registered provider must have and implement a documented internal complaints handling and appeals process and policy, and provide the overseas student with comprehensive, free and easily accessible information about that process and policy.</p> <p>10.2 - The registered provider's internal complaints handling and appeals process must:</p> <ul style="list-style-type: none"> - 10.2.1 - include a process for the ... student to lodge a formal complaint or appeal if a matter cannot be resolved informally - 10.2.2 - include that the provider will respond to any complaint or appeal the .. student makes regarding his or her dealings with the registered provider, the registered provider's education agents or any related party the registered provider has an arrangement with to deliver the overseas student's course or related services - 10.2.3 - commence assessment of the complaint or appeal within 10 working days of it being made in accordance with the registered provider's complaints handling and appeals process and policy, and finalise the outcome as soon as practicable - 10.2.4 - ensure the ... student is given an opportunity to formally present his or her case at minimal or no cost and be accompanied and

	<p>assisted by a support person at any relevant meetings</p> <ul style="list-style-type: none"> - 10.2.5 - conduct the assessment of the complaint or appeal in a professional, fair and transparent manner - 10.2.6 - ensure the overseas student is given a written statement of the outcome of the internal appeal, including detailed reasons for the outcome - 10.2.7 - keep a written record of the complaint or appeal, including a statement of the outcome and reasons for the outcome. <p>10.3 - If the ... student is not successful in the registered provider's internal complaints handling and appeals process, the registered provider must advise the overseas student within 10 working days of concluding the internal review of the ... student's right to access an external complaints handling and appeals process at minimal or no cost. The registered provider must give the overseas student the contact details of the appropriate complaints handling and external appeals body.</p> <p>10.4 - If the internal or any external complaints handling or appeal process results in a decision or recommendation in favour of the ... student, the registered provider must immediately implement the decision or recommendation and/or take the preventive or corrective action required by the decision, and advise the overseas student of that action.</p> <p><i>Note: The existing complaints process is often similar if not the same for domestic students but is currently not enforced and should be strengthened through the Higher Education Commission.</i></p>
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3. How do we ensure that the Code and the new arrangements work together effectively?

Referring to the previous sections, the Code should be for a Universal Student Support Standard that covers both domestic and international students since numerous sections of the existing standards for supporting international students are also applicable to domestic students belonging to equity groups. Policy specific to international students around student visas and education agents can form a separate section that apply to international students with the Code. A separate section can also be applicable to Aboriginal and Torres Strait Islander students which would outline the specific support available to this cohort.

4. What other detail should be included in the Guidelines and why?

Standard 10: Complaints and appeals guidelines should be strengthened in a Universal Student Support guideline. Our recent response to the TEQSA *Good Practice note: Preventing and responding to sexual assault and sexual harassment in the Australian higher education sector*.¹ We

¹ Phuah E, Leroy-Dyer S., (2023), Response to TEQSA's Sexual harm good practice note consultation 2023, Council of Australian Postgraduate Associations, last edited 3 August 2023,

highlighted the inadequacies of complaints and reporting procedures. Consequently the most recent data revealed in the *2021 National Student Safety Survey* indicate no real improvement from the previous report,² *Change The Course: National Report on Sexual Assault and Sexual Harassment at Australian Universities (2017)* to the address the prevalence of sexual harassment and sexual assault on campuses.³

We believe that there should be a section specific guidelines specifically for supporting postgraduate research students. Resources provisions such as whether they are provided their own desk on campus for full-time students, a work laptop or desktop, software grants, travel grants and supplementary research grants will vary between institutions and schools within the same institutions. Without a minimum resource guarantee for research students, many students that are offered less resource provisions and have to self-fund their own research are often disadvantaged compared to their peers. Thus, it is our view that guidelines for a minimum resource guarantee be provided to students undertaking a research degree.

5. Are the proposed individual student and institutional level requirements practical, and implementable? If not, how could they be improved?

We recognise that addressing individual needs can be a strain on institutional resources or a duplication of support from other support systems (i.e. the National Disabilities Insurance Scheme, ISSP funded support for Aboriginal and Torres Strait Islander students). However, another approach is to recognise and address common barriers that all students face may affect students of equity groups more. Ensuring sufficient study spaces are available on campuses, affordable campus parking, easy access to public transport that run frequent schedules (shuttle busses between campuses), creating a safe sensory friendly spaces on campuses (i.e. University of Queensland Union's Disability space), timely response to requests for student support and reducing the usage of automated systems for communicating sensitive matters that may cause student anxiety. (i.e. termination of scholarship).⁴

6. Are there examples of best practice, reports and reviews that focus on supporting students to complete their studies, that could be drawn on for the Guidelines?

There are a number of reviews that have taken place overseas, such as the Scottish Higher Education Enhancement Committee Supporting student success: A forward-looking agenda Final report 2009 that may have some relevance and the ANZSSA Guidelines for Effective Practice in Orientation and Transition may have some applicable concepts worth considering.

7. What other reporting requirements need to be included to demonstrate compliance with the *Support for students policy* requirements?

<http://www.capa.edu.au/wp-content/uploads/2023/09/CAPA-and-NATSIPA-TEOSA's-Sexual-harm-good-practice-note-consultation-2023.pdf>

² Heywood, W., Myers, P., Powell, A., Meikle, G., & Nguyen, D. (2022). National Student Safety Survey: Report on the prevalence of sexual harassment and sexual assault among university students in 2021. Melbourne: The Social Research Centre.

³ Australian Human Rights Commission 2017, *Change The Course: National Report on Sexual Assault and Sexual Harassment at Australian Universities* (2017), last edited 1st August 2017, https://humanrights.gov.au/sites/default/files/document/publication/AHRC_2017_ChangeTheCourse_University_Report.pdf

⁴ Groch S. (2023), Their grades had slipped by less than 1%. The uni cut off their scholarships, *The Age*, last edited 13 September 2023, <https://www.theage.com.au/national/victoria/their-grades-had-slipped-by-less-than-1-percent-their-uni-cut-off-their-scholarships-20230822-p5dyio.html>, last viewed 21 September 2023.

The *Support for students policy* should include guidelines for providers to engage with authentic student advocacy and representation to ensure ongoing consultation with students. Regular reporting of student feedback on the performance of ongoing support services should be monitored by an external body to ensure compliance.

8. Is there other information that should be reported, or that could be repurposed, that would demonstrate compliance, and assist in monitoring and evaluating the outcomes of these Guidelines?

We have seen over the years, Higher education providers have shown to be highly responsive to bad publicity from externally conducted student surveys.⁵ The annual Quality Indicators for Learning Teaching (QILT) survey could be used to gather student feedback on how the universities are complying with these Support for Student guidelines. We have also advocated that the QILT survey has limited questions applicable to postgraduate students and no questions specifically to monitor the student satisfaction of research students.

9. What needs to be taken into account in the Department's approach to non-compliance?

We have seen in other areas such as sexual assault and sexual harassment policies where guidelines have been provided but compliance is neither monitored or enforced have resulted in no signs of improvement. Thus, it is our view that the department must ensure adequate penalties for the non-compliance of providers with these guidelines.

⁵ Matchett S. (2022), Uni Melbourne says it has “work to do” to improve student experience, *Campus Morning Mail*, last edited 26 August 2022, <https://campusmorningmail.com.au/news/uni-melbourne-says-it-has-work-to-do-to-improve-student-experience/>, last viewed 21 September 2023.