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Support for students policy consultation paper

Navitas submission
15 September 2023

Navitas' response to the consultation paper: Support for students policy

Navitas welcomes the opportunity to respond to the consultation paper *Support for students policy*. Navitas is supportive of the government's removal of the academic progression requirements for ongoing HELP eligibility and associated efforts to ensure that institutions policies are effective in their goal of supporting students to succeed Navitas supports the consultative model of the sector having opportunity to provide feedback on the proposed detail as outlined in the consultation paper.

The following submission outlines information on Navitas and its operations, provides high level feedback on the approach proposed in the consultation paper, and directly responds to each of the questions asked in the consultation paper.

1. Context and key considerations

Navitas is a leading provider of preparatory pathway support programs and operates two standalone higher education providers

Navitas Pty Ltd comprises multiple colleges and higher education providers that deliver courses to both domestic and international students across Australia. This includes our university partnerships which deliver pathway courses to international and domestic students at the higher education Diploma level to prepare them for transition to study with our university partners. Navitas also operates two standalone higher education providers – SAE Institute and Australian College of Applied Professions (ACAP) – which primarily deliver to domestic Australian students.

The renewed focus on student support is appropriate, builds on existing requirements and Navitas supports the minimum requirements set out in the consultation paper

Navitas is strongly supportive of efforts by the government to increase sector focus on student support and ensure providers are supporting students to successfully complete their studies. This is important to positive outcomes for students, particularly students from underrepresented groups, as well as ensuring that government and student investment achieves positive educational, livelihood and economic outcomes. Specifically, Navitas supports:

- **The immediate removal of the 50% fail rate rule,** with this providing a barrier to students to complete their studies, with a disproportionate effect on students from disadvantaged and equity cohort backgrounds.

- **The government's focus on ensuring institutions proactively identify and support 'at risk' students,** which should drive a consistent application of learning and predictive analytics to identify students that may not complete their studies without intervention or additional support.

- **The requirements set out in the Support for student policy consultation paper that build on the existing requirements for providers**, including through the National Code for international students and the Higher Education Standards Framework (HESF) more generally. Most providers will also have in place a suite of institution specific policies to support student retention and provide access to academic and non-academic supports. Introduction of the policy approach should improve these without placing undue burden on high-quality providers.

- **The minimum requirements set out in the consultation paper which are appropriate and supported by Navitas,** specifically that providers 'develop and apply student entry procedures appropriate to their mission, context and cohort' and that it is 'standard practice to identify, protect and provide support for vulnerable students and students at risk of failing'.

There are some changes to the proposed implementation and reporting of the Support for student policies that Navitas believes will enhance effectiveness

There are a small number of areas that are either not clear or where further clarification and considerations would be valuable. These are:

- **Student support policies need to balance broader government objectives regarding access and supporting positive outcomes for students.**, The University Accord is likely to set objectives for attainment and parity in equity group higher education participation, and it is important that providers that make the greatest contribution to access do not have their performance inappropriately assessed or limited through unreasonable determinations of non-compliance.

- **The proposed 'support for individuals' and 'institutional level requirements' may require a transition period and/or flexibility in how these apply for each institution,** noting that some of the proposed details may extend beyond the scope of what all providers currently offer. Clarification is needed on the specific requirements for providers to comply with each identified area.

- **Reporting requirements should be structured to deliver the greatest insight on 'what works' whilst minimising the reporting burden on providers.** The proposed direct reporting requirements to the Minister may not necessarily capture an evidence base on 'what works' or provide the consistent information required to inform systematic evidence-based decision making.

Ensuring the changes to the Guidelines appropriately consider the broader context around access and participation, give further clarity and flexibility on the requirements for providers and ensure reporting provides consistent information to enable a robust understanding what is working and what is not will ensure the policy is as effective as it can be as well as supporting the broader objectives of government.

Navitas makes four recommendations to further improve the Support for student policy

A summary of the recommendations proposed by Navitas are included below.

Figure 1 | Summary of recommendations made by Navitas

Consultation theme	Recommendation
Current support measures	**Recommendation 1.** The Guidelines should mirror the wording of the National Code to ensure providers have consistent support obligations for domestic and international students, specifically through inclusion of 'reasonable support' and 'providing learning support services consistent with course requirements, mode of study and learning needs of [different] cohorts'.
Policy	**Recommendation 2.** The 'Support for individual requirements' to be included in the Guidelines should include active consideration of whether a different course, including preparatory pathway programs, would be a more appropriate study option for a student.
Reporting	**Recommendation 3.** The government explore options to revise proposed reporting arrangements for providers to ensure they are not overly burdensome and so that reporting provides the information necessary for the government and the sector to understand what supports are and are not effective. This should include greater integration with the TCSI reporting system through a separate Support for students report. A TEQSA Community of Practice for Student Support should be established to enable providers to share and develop good practice in student support across the sector.
Implementation	**Recommendation 4.** The government include a short transition period for the policy to ensure providers are able to make the operational changes necessary to meet the new requirements.

2. Response to consultation questions

Current student support measures

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

Navitas believes that there would be benefit in the Higher Education Provider Guidelines outlining the same requirements for domestic students as the National Code does for international students.

Specifically, the National Code includes requirements to offer 'reasonable support' to enable students to achieve expected learning outcomes and 'provide learning support services consistent with the course requirements, mode of study and learning needs of overseas student cohorts'.

In contrast, the Guidelines currently focus on retention and student support through a limited approach of 'assessing genuine students, including students' engagement in the course' or 'satisfied course requirements'. Given higher attrition rates for domestic students compared to international students, an increased focus in retention support for this cohort would be valuable.

Inclusion of wording related to 'reasonable support' and 'providing learning support services consistent with course requirements, mode of study and learning needs of [different] cohorts' would be appropriate. This ensures the same support obligations of providers for international students are also in place for domestic students.

2. How do we ensure that the Code and the new arrangements work together effectively?

Navitas would expect there to be strong alignment between the National Code and new arrangements put in place, including through revised Guidelines. As outlined, this will be important to ensure provider are required to deliver consistent levels of student support to both international and domestic students. Changes aligned with the proposed above will support this.

Recommendation 1

The Guidelines should mirror the wording of the National Code to ensure providers have consistent support obligations for domestic and international students, specifically through inclusion of 'reasonable support' and 'providing learning support services consistent with course requirements, mode of study and learning needs of [different] cohorts'.

Changes to the Higher Education Provider Guidelines – policy

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

Navitas believes the 'Support for individual requirements' details should also include active consideration of whether an alternative course would be a more appropriate fit for a student. This should include consideration of preparatory programs, including Enabling and Foundation programs and Higher Education diploma programs. University pathway programs that provide additional supports, including Enabling, Foundation and higher education Diploma programs, have been found to have improved student success rates, however these are currently underutilised by domestic students with support needs. Consideration of the most appropriate course should occur both during the admission process and once a student has commenced their studies.

This would be consistent with the broader objectives of the policy which state that the 'new requirements will re-enforce thneed to assess academic and non-academic suitability, both in the lead up to enrolment and an

ongoing basis' as well as stating that the policy must also include 'how the higher education provider will assess academic and non-academic suitability for continuing study'. This shift in focus to ensure that retention strategies cover the entire student lifecycle, including admission and commencement, is important.

Explicit inclusion of consideration of more appropriate programs and opportunities in preparatory programs would help ensure all appropriate information is provided to students that may be better placed studying in alternate programs.

> **Recommendation 2**
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> The 'Support for individual requirements' to be included in the Guidelines should include active considerations of whether a different course, including preparatory pathway programs, would be a more appropriate study option for a student.

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

Navitas is broadly supportive of the other proposed individual and student level requirements, however proposes that further consideration be given to including a transition period and/or ensuring there is flexibility in how these apply for each institution.

The paper outlines that a quality higher education provider fulfilling existing requirements 'will likely already have policies in place to support students to succeed'. Navitas supports this assertion, however we are concerned that the prescriptive nature of the individual student and institutional level requirements as proposed may mean that a mature, quality provider might not meet the requirements in full initially. The level of support prescribed under each of the requirements could also be made clearer. For example, 'culturally appropriate' academic and non-academic supports is not defined. Similarly, the proposed wording does not make clear if 'financial assistance' requires providers to explicitly provide financial assistance to students or provide information on financial assistance. If the former, this would represent a significant expansion of provider responsibilities beyond current requirements.

Finally, enforcement of the Guidelines should also recognise that maturity across these areas may vary for providers. This should be considered in compliance considerations – especially for smaller non-university providers.

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

Navitas believes that it is important that Student Support policies adopt a holistic approach to student retention and success. This should both consider the types of 'supports' that are provided to students and the approach to identify students that are 'at risk'.

In terms of the **supports available**, best practice indicates that 'support' for retention should include both academic supports through the core delivery model and broader non-academic supports. These are core considerations for all students and, for Navitas, are central to the delivery model we operate. In addition, further supports may be required for students that require particular academic or non-academic supports to succeed. The Navitas Student Retention Driver Tree, included in Appendix A, considers the range of factors that can positively contribute to retention and the actions providers can take to best facilitate these. Provider's *Support for Students* plans should explicitly identify the core areas of delivery that support retention, as well as the 'additional supports' or targeted programs needed by at risk students.

The *Student Support* plans will also require providers to identify their **approach to identifying 'at risk' students.** Navitas believes that it is important that these not only focus on student outcomes, but also on student characteristics, mode of study and engagement factors. A narrow focus on 'student outcomes (such as GPA or fail rate) risks only identifying the student after failure has occurred. Instead, a mature process should include:

- **Before study.** The student characteristics (higher needs, equity group membership, age) and participation and admission factors (part-time, online, basis for admission) that may result in higher attrition levels and may require additional forms of support.

- **Initial study engagement factors.** Including attendance in classes and lectures, engagement with online resources, library or student support services and other forms of learning analytics to understand students at risk of disengaging from studies.

- **Student outcomes**. Including grade point average (GPA) or formative assessment to identify students that are at risk of failing more than 50% modules and / or dropping out.

These should be underpinned by data informed initiatives to better understand the drivers of retention and identify students that may be 'at risk'. This includes the use of learning analytics to enable targeted actions for at-risk students, which recommend tailored supports or alternative pathways.

While these measures will not always identify students that are 'at risk' they should be considered as components of a mature approach to monitoring retention. Greater guidance from the department on expectations in this area would be valuable.[1]

Changes to the Higher Education Provider Guidelines – reporting

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

Navitas is concerned that the proposed reporting arrangements will be burdensome for providers and will not be in a format that will generate the necessary data to provide valuable insights on student support needs Instead we propose greater integration with the Tertiary Collection of Student Information (TCSI) and the establishment of a TEQSA Community of Practice.

The consultation paper outlines a requirement for providers to report regularly to the Minister. The paper states that this may include on the efficacy and effectiveness of the policy, opportunities for improvement, including information on numbers of students identified as 'at risk', supports provided and comparison of academic outcomes to other students.

Navitas believes use of existing systems would minimise the burden on providers and more importantly, facilitate collection of information that allows stronger evidence on 'what works' and what doesn't work in supporting student retention. This could be done through systematic collection of information about identified 'at risk' students and the interventions and support they receive. Linking this with students outcomes data (such a unit pass rates) through the existing TCSI reporting requirements will provide a better understanding of both who is 'at risk' and how effective the supports provided by each institution have been. In turn, this will provide a more robust evidence base and will allow the department (and third-party researchers) to identify what is effective in supporting student completion.

Existing regulatory requirements for re-registration with TEQSA currently assess student outcomes in making this determination. The introduction of a Community of Practice on Student Support would enable providers to develop and share good practice across the sector as well as inform ongoing improvement to the policy requirements and Provider Guidelines.

If these were introduced, direct submission reporting to the Minister may not be required or could be minimised in frequency and content. The current proposal for multiple annual reports to be prepared for the Minister appears excessive and could impose an undue administrative burden on providers. Prioritisation of further engagement with providers could then occur through a data informed approach.

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[1] See Cherastidtham & Norton (2018) 'University attrition: what helps and hinder university completion?, Grattan Institute, Available at: University-attrition-background.pdf (grattan.edu.au) and McMillan (2011) 'Student retention: current evidence and insights for improvement', available at: "Student retention : current evidence and insights for improvement" by Julie McMillan (acer.edu.au) for a breakdown of drivers of attrition and retention.

7. **Is there other information that should be reported, or that could be re-purposed, that could demonstrate compliance and assist with monitoring and evaluating the outcomes of these Guidelines?**

As outlined above, there may be opportunities for amendment to TCSI reporting to meet reporting requirements and build a stronger evidence base on 'what works'.

Much of the information that the consultation paper outlines would be included in the report to the Minister is already reported through TCSI. This includes demographic information on the student, study details, course/discipline details and academic progression and outcomes (such as unit study outcome and, from this, success rates and attrition).

A separate 'Support for students' report could include two additional aspects:

- Whether the student has been identified by the provider as being 'at risk', and

- The 'additional supports' the student has received (aligned with defined categories of support which may include tutoring, alternative course transition, mental health assistance, counselling and financial aid).

The recent introduction the Unique Student Identifier (USI) would also allow for easier 'matching' with this information to understand factors that contribute to student attrition. This approach would build on the department's proposal to 'use a range of mechanisms to monitor compliance – including through information provided as part of the TCSI system', however will expand this to focus not only on compliance but also building an evidence base whilst reducing reporting burden.

Recommendation 3

The government explore options to revise proposed reporting arrangements to ensure they are not overly burdensome on providers and so that the reporting approach provides the necessary information for the government and the sector to understand what supports are and are not effective. This should include through greater integration with the TCSI reporting system through a separate 'Support for students' report.

A TEQSA Community of Practice for Students Support should be established to enable providers to share and develop good practice in student support across the sector.

Compliance and non-compliance

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

Overall, Navitas is not concerned with the proposed approach to non-compliance. Navitas supports proposed compliance approaches in relation to having and complying with a provider's own *Support for students* policy, but nuance is required in assessing student outcomes and provider performance.

Navitas understands that there are two related but distinct compliance considerations as part of this policy. These are:

- **Having** and **complying** with a *Support for students policy*

- Associated student outcomes and assessment of provider performance.

Each is discussed separately.

Navitas fully supports the intended compliance approach for providers in relation to having and complying with their own *Support for students policy*. We note that both 'not having a policy' and 'failing to comply with their [own] policy' can result in infringement notices with financial fines applied. Navitas' view is that these requirements are reasonable, and providers should be able to meet them.

On the second area, the focus on student outcomes and provider performance Navitas believes that it is important that the department's (or TEQSA as the regulators') assessment of takes account of the differences

and nuances in cohorts for different providers, as well as considers the broader government and sector objectives to support access and equity cohort participation.

This includes for pathway programs, where students are often less academically prepared but are supported to gain the skills and experience to succeed in subsequent university study.

Assessment of performance considering the mission and cohorts of individual providers is identified in the Consultation Paper as not being a 'one size fits all approach', but further guidance on how this would specifically be applied would be valuable.

There are also opportunities to use the 'Compacts' proposed in the University Accord Interim Report to support this. A provider would therefore balance access and equity objectives with an appropriately agreed target for completion, attrition or student success. This would acknowledge the unique challenges and operational contexts faced by different types of education providers, including those offering pathway programs. This could be set in agreement between the institution and the government (including potentially through the Tertiary Education Commissioner).

Implementation

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

While Navitas believes the proposed approaches are reasonable, there may be some benefits in including a short transition period. This will ensure providers are able to make the operational changes necessary to meet the new requirements and properly embed these into their operations where they are required to do so.

Recommendation 4

The government should include a short transition period for the policy to ensure providers are able to make the operational changes necessary to meet the new requirements.

Submitted on behalf of Navitas by:

Ethan Fogarty – Senior Manager, Government Relations, Navitas

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STUDENT RETENTION DRIVER TREE

MAPPING FACTORS THAT DRIVE STUDENT SUCCESS

Drawing on Navitas good practice and evidence from the substantial body of international research, the Student Retention Driver tree was developed by Navitas Learning and Teaching Services to inform its work in supporting students to successful outcomes. More information: learningandteaching-navitas.com

RETAINED STUDENT

CONNECTED STUDENT

- **ROBUST SUPPORT STRUCTURE**
  - SUCCESSFUL TRANSITION IN
    - Pre-arrival information/ experience
    - Engineered social connections
    - Settling in advisory services
    - High Impact Unit re-design
    - 10-point transition plan
    - First-term re-design
    - Tracking and acting on flags
    - Learning support services
    - Student Load policies
    - Back-on-track plans
    - Safety nets in place
    - Referral services
  - RELATIONSHIPS WITH TEACHERS AND STAFF
    - Collecting/acting on student feedback
    - Frequent teacher/ student contact
    - Teacher consultation mechanism
    - Student staff ratio management
    - Teaching excellence culture
    - Staff member allocation
  - MEANINGFUL CONNECTION WITH PEERS
    - Extended, organised transition in activities
    - Group work activities and assessment
    - Know your students' requirements
    - Student involvement programs
    - Community events/ gatherings
    - Teacher expectations and PD
  - CLEAR SENSE OF PURPOSE
    - Work integrated learning opportunities
    - Role models & Alumni engagement
    - Information about work outcomes
    - Authentic projects/ assessment
    - Embedded into programs
    - Career advisory

- **STRUCTURED AND RELEVANT CURRICULUM**
  - Range of curriculum resources and media
  - Aligned learning outcomes/ assessment
  - Close monitoring of content interaction
  - Curriculum review process/ policy
  - Authentic and relevant content
  - Mapped curriculum

- **ACTIVE AND ENGAGING LEARNING ENVIRONMENTS**
  - Flexibility to organise for student group
  - Know your students requirements
  - Classroom management policy
  - Clear/ aligned L&T principles
  - Teacher expectations and PD
  - Time on task requirements

CAPABLE STUDENT

- **SKILLED AND SUPPORTIVE TEACHERS**
  - Systematic and linked PD and performance management
  - Recognition and sharing of effective practice
  - Peer observation and development plans
  - Clear teacher expectations and role clarity
  - Collecting/ acting on student feedback
  - Teaching excellence culture

- **WELL DESIGNED ASSESSMENT**
  - Tasks designed to build expertise/ confidence
  - Developmental assessment design
  - Ongoing formative opportunities
  - Reinforcing assessment policy
  - Low stakes first assessment
  - Explicit criteria and rubrics

- **TIMELY AND AFFIRMING FEEDBACK**
  - Formative assessment built into classes
  - Teacher professional development
  - Reinforcing assessment policy
  - Systems for efficient feedback
  - Peer Feedback mechanisms
  - Monitoring and coaching

- **INTEGRATED SKILLS DEVELOPMENT**
  - Developmental assessment design
  - Learning design and teacher PD
  - Student Success curriculum
  - Explicit criteria and rubrics
  - Establish prior knowledge
  - Embedded English skills

- **HIGH IMPACT UNIT SUCCESS**
  - Weekly activity monitoring/ intervention
  - Specify relevance throughout unit
  - Integration of skills into teaching
  - Case management approaches
  - Teaching team selection
  - Assessment re-design