

External Review of International Recruitment and Admissions Practices

University response to recommendations

Note: Completion of action items for each recommendation will be confirmed by relevant Senior Officers to the Director, Academic Quality and Standards, who will confirm overall progress to Academic Senate on a quarterly basis.

Recommendation 1

It is recommended that UTAS include reference to the HESF in the “relevant legislation” section of the Admissions Policy.

Response:

The University accepts this recommendation. The Admissions Policy will be reviewed ahead of schedule to include reference to the HESF.

Recommendation 2

It is recommended that UTAS include reference to the English Language Guidelines in the “Supporting Documentation” section in the Admissions Policy.

Response:

The University accepts this recommendation. The Admissions Policy will be reviewed ahead of schedule to include reference to the English Language Guidelines, which will also be reflected in the web-based materials.

Recommendation 3

It is recommended that UTAS clarify in the Admissions Policy that all changes in admission requirements for courses must be approved by Academic Senate.

Response:

The University accepts this recommendation but notes that the table of approvals clearly states that amendments to admission requirements for courses must be approved by Academic Senate. The Admissions Policy also includes this statement, but it is inconsistent in places. Rule 6 will be checked for alignment with policy.

Recommendation 4

It is recommended that UTAS implement a simplification of its policy framework and a reduction in the numbers of levels in the hierarchy of documents to enhance usability.

Response:

The University accepts this recommendation but notes that it is strictly speaking somewhat out of scope for this review. Nonetheless we recognise the connections with this review and will refer the recommendation to Governance and Executive Services for follow up. Management also notes that the revised policy framework has been endorsed by University Executive Team and Audit and Risk Committee.

Recommendation 5

It is recommended that UTAS codify all academic delegations and that they are brought together in a schedule or register and subject to at least annual review by Academic Senate.

Response:

The University accepts this recommendation and agrees that the codification of academic delegations will enhance compliance with HESF Standard 6.3.2c.

Recommendation 6

It is recommended that UTAS review, update and implement the English Language Proficiency Policy in line with sector good practice, and in that review, consider whether its title is still appropriate, and that responsibilities are more closely defined.

Response:

The University accepts this recommendation. The English Language Proficiency Policy will be reviewed and reconsidered.

Recommendation 7

It is recommended that UTAS include in Rule 6 Admission, Assessment and Student Progress Rule, Part 3 a statement that Credit and RPL will be granted in accordance with Paragraph 1.2.2 of the HESF to ensure that students are not disadvantaged and that the integrity of the course of study and qualification are maintained.

Response:

The University accepts this recommendation and agrees that the codification of academic delegations will enhance compliance with HESF Standard 1.2.2.

Recommendation 8

It is recommended that UTAS update Ordinance No 9 Student Discipline, to codify more centralised practices and penalties occurring within the University and making reference to recent TEQSA Guidance and Good Practice Notes relating to Academic Integrity.

Response:

The University accepts this recommendation and considers it to be in alignment with, and to a large extent subsumed by, the revisions to Ordinance 9, which are planned for introduction in January 2020 and include a single penalty schedule. The revised Ordinance and associated materials will include reference to national statements of good practice.

Recommendation 9

It is recommended that UTAS review and update its website as a matter of urgency to enhance usability and information transparency for potential applicants and other users, and as part of that to evaluate the impact and accuracy of the Chinese website.

Response:

The University accepts this recommendation and takes it to refer to websites relating to admissions. The Chinese language website will be evaluated.

Recommendation 10

It is recommended that UTAS lift its ELP admission requirements on a course-by-course basis, both undergraduate and postgraduate, particularly for courses with specialised requirements for vocabulary/terminology through submissions from Schools and Colleges to Academic Senate.

Response:

The University accepts this recommendation and will undertake this data analysis.

Recommendation 11

It is recommended that UTAS must include student performance reports by cohort including at minimum, domestic and international students, by country and basis of admission, and students at risk as regular reports each semester to Academic Senate.

Response:

The University accepts this recommendation and agrees that reporting student outcomes regularly to Academic Senate will enhance compliance with HESF Standards 1.1.1, 1.3.4 and 1.3.5.

Recommendation 12

It is recommended that UTAS consider the introduction of targeted discipline-specific language courses via the ELC in order to introduce more appropriate vocabulary, or alternatively the development of language units within degree courses, as a means of improving pass rates from ELC students.

Response:

The University accepts this recommendation and will consider the relative merits of these two suggestions. We note that targeted discipline-specific language courses are already underway in some areas.

Recommendation 13

It is recommended that UTAS discuss the recent directive from the Vice-Chancellor and the Interim Working Committee and its supporting data at Academic Senate, and it is further recommended that Academic Senate approve the variations to international student admission requirements, notably the requirements for particular groups to undertake formal ELP testing and the restriction on MOI as the basis for admission.

Response:

The University notes that interim changes to ELP requirements are already in place. These interim arrangements were agreed with the Chair of Academic Senate and an update was provided to Academic Senate by the Provost in June 2019. A further update on ELP and MOI as a basis of admission will be provided to Senate in due course.

Recommendation 14

It is recommended that UTAS consider ways to minimise late admissions of international students, including more stringent enforcement of enrolment rules and even consideration of moving semester starting dates.

Response:

The University accepts this recommendation and will immediately assess mechanisms to minimise the late enrolment of International students. Moving semester starting dates is not currently in scope.

Recommendation 15

It is recommended that UTAS review its provision of learning and language support, particularly for international students, and consider ways to increase that support commensurate with student load, including consideration of commercial online systems.

Response:

The University accepts this recommendation and will undertake an internal review of learning and language support for International students.

Recommendation 16

It is recommended that UTAS consider its approach to academic risk and ensure that Academic Senate is included in the Risk Management Framework and the Risk Management Policy, and that the academic risk register, or schedule is an item for regular review in the Academic Senate Work Plan.

Response:

The University accepts this recommendation and will consider its approach to academic risk.

Recommendation 17

It is recommended that UTAS undertake a compliance assessment of the Academic Senate and its sub-committees with the requirements of the HESF.

Management Response:

Management accepts this recommendation but notes that is strictly speaking somewhat out of scope for this review. Management will undertake a compliance assessment of the Academic Senate and its sub-committees with the requirements of the HESF. This is in line with work already underway.

Recommendation 18

It is recommended that UTAS consider the reinstatement of a University Admissions Committee, which may have both governance and operational responsibilities.

Response:

The University accepts this recommendation and will reinstate the Admissions Committee chaired by the Provost, with a dual reporting line to both University Executive Team and Academic Senate.

Recommendation 19

It is recommended that UTAS extend the term of office of at least the current Acting Chair of Academic Senate and appoint at least one Deputy Chair for Academic Senate as soon as practicable.

Response:

The University believes this recommendation to be out of scope for this review. However, the recommendation will be referred to the Vice-Chancellor for consideration.



UNIVERSITY *of*
TASMANIA

External Review of International Recruitment and Admissions Practices

University of Tasmania

4 June 2019



Hilary Winchester

Higher Education
Quality Assurance

List of Acronyms

BI	Business Intelligence
DET	Department of Education and Training
EFTSL	Equivalent Full Time Student Load
ELC	English Language Centre
ELP	English language proficiency
ESOS	Education Services for Overseas Students Act
GTE	Genuine Temporary Entrant
HESF	Higher Education Standards Framework
ISB	International Student Barometer
MITS	Master of Information Technology and Systems
MOI	Mode/ Method of Instruction
RPL	Recognition of Prior Learning
SAR	Special Administrative Region (of China)
TEQSA	Tertiary Education Quality and Standards Agency
TOR	Terms of Reference
ULTC	University Learning and Teaching Committee
UQSC	University Quality and Standards Committee
UTAS	University of Tasmania

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Executive Summary and Lists of Commendations and Recommendations

Executive Summary

This review of International Recruitment and Admissions Practices at UTAS supports the Executive action taken in May 2019 to restrict the basis of international admissions, particularly those occurring on the basis of Mode of Instruction rather than formal English language proficiency entry tests. UTAS has adopted an evidence-based and data-driven approach, which has required forensic analysis of student performance and will need to form the basis of regular cohort reporting in the future for both management and governance purposes. The University has also made a shift of strategic direction from rapid to sustainable growth, which is welcome to most staff, but will have financial and organisational implications.

This report takes place against a background of significant international student growth in Australian higher education. UTAS has experienced considerable international student growth from 2016, although at 26% of its total student load in 2018, this is not at a level as extreme as some other universities. The rapid growth has, however, brought into question admission standards especially in relation to English language proficiency and also the policy framework, support mechanisms and governance oversight for international students.

In brief, this review finds that the University's policy framework is adequate, although some policies need revision and improvement and others are overdue for review. In particular, the English Language Proficiency Policy, which covers a broader remit than its title suggests, has not been reviewed since 2017, and if revised and implemented would form a very sound basis for an international student support policy. This review also finds improvement in management of academic integrity issues, which is in progress and is still to be reflected in the policy framework.

The data analysis undertaken in May 2019 reveals significant variations in student performance by cohort on basis of admission and country of origin. In particular, analysis shows that students admitted on the basis of Mode of Instruction perform more poorly and have higher failure rates than those admitted on formal entry tests of English proficiency. The forensic data analysis is a valuable tool not previously available at UTAS, and this review recommends that such reports should be used for diagnostic and improvement purposes in future.

English language and academic entry standards are not the only reasons for student dissatisfaction or failure and this review also examines other elements of induction and student support that assist students to achieve learning outcomes. In some areas it considers aspects which are wider than, but impinge on, its brief, such as the usability

of the University's website for transparency of information and the complexity of UTAS' policy framework.

Academic governance oversight has been weak, partly because appropriate reports have not been available. This review makes several recommendations to improve academic governance oversight as well as related matters which include academic risk and academic delegations to help ensure UTAS achieves the student quality and outcomes required of a major Australian university.

List of External Review Commendations

External Review Commendation 1	UTAS is commended for its proactive stance in calling this review at short notice, encouraging submissions from a wide variety of stakeholders, and ensuring an open but confidential process.	Page 2
External Review Commendation 2	UTAS is commended for its comprehensive suite of ESOS-related policies.	Page 15
External Review Commendation 3	UTAS is commended for its recent forensic data analysis of international student admissions by country, level of study and basis of admission, which will form a sound basis for further data-driven decision making.	Page 18
External Review Commendation 4	UTAS is commended for closing the loop on the Academic Senate review of 2017.	Page 26

List of External Review Recommendations

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External Review Recommendation 2	It is recommended that UTAS include reference to the English Language Guidelines in the "Supporting Documentation" section in the Admissions Policy.	Page 5
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External Review Recommendation 19	It is recommended that UTAS extend the term of office of at least the current Acting Chair of Academic Senate and appoint at least one Deputy Chair for Academic Senate as soon as practicable.	Page 29
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Acknowledgements

The reviewer wishes to acknowledge the exceptional support provided by the Provost, Professor Jane Long and staff of the Academic Division. Ms Rebecca Shaw supplied reams of information in soft and hard copy and Ms Kerrie Bidwell provided back up. The schedule was well organised and all staff were most helpful in sharing their views, insights and suggestions.

Ms Helen Ujvary and Dr Angela Noack assisted in the research for and presentation of this report as Associates of Hilary Winchester Pty Ltd, without whose help this report could not have been delivered in the required time frame.

1 Overview and Background

1.1 Overview

The University of Tasmania (UTAS) requested Professor Hilary Winchester of Hilary Winchester Pty Ltd to undertake a review of its policies and processes in relation to admission of international students, and the suitability of the University's approaches in determining levels of English Language competence required to equip applicants for success. The consistency, fairness and transparency of those processes as required under the relevant national legislative and regulatory frameworks will be considered, and evidence of learning outcomes achieved by student cohorts to date.

1.2 Background: International Student Growth

International student enrolments have grown sharply in Australia since 2013 from approximately 328,332 across the sector to 431,401 in 2017. Most of that growth has been in postgraduate enrolments, predominantly from North-East Asia, particularly China, and from Southern and Central Asia, particularly India. Nationally, international student growth from 2016-17 was 10.5% and in 2017-18 reached 11.8%.¹ The education of international students is Australia's third largest export behind iron ore and coal. Data on International Trade from the Australian Bureau of Statistics 2016-17 valued the international education sector at over \$30 billion a year, with Tasmania receiving less than 1% of that, at \$299 million.

In 2018, UTAS total enrolments (headcount) were 36,334 of which 7,398 were international (UTAS data warehouse). In 2017, UTAS total enrolments were 37,648 (Department of Education and Training (DET) Higher Education Statistics 2017), of which 6,487 were international. In terms of student load, rather than headcount, the UTAS data warehouse records a total student load in 2018 of 21,197 Equivalent Full Time Student Load (EFTSL) of which 5,574 (26%) were international. The 2017 Annual Report records a total student load of 21,805 EFTSL of which 16,766 were domestic and 5,039 (23%) were international. These data show a fairly steady total student load but with an increasing number and proportion of international students between 2017 and 2018. This trend seems to continue into Semester 1, 2019 but the data set is incomplete.

The trend in UTAS' international student load has been upward, from 3,538 EFTSL of a total of 18,986 in 2014 (19% international) to 23% in 2017 (Annual Report, 2017, p 18)² and to 26% in 2018.

1

https://docs.education.gov.au/system/files/doc/other/2018_first_half_year_higher_education_student_summary_time_series.pdf

² https://www.utas.edu.au/data/assets/pdf_file/0019/1140607/Annual-Report-web-version.pdf

While the growth of international student numbers and proportion has been considerable, it is by no means extreme compared to other Australian universities. This growth has undoubtedly contributed to the University's revenue but also its diversity. Nonetheless, the UTAS Annual Report for 2017 (p 1) highlighted the Global Division's increase in revenue at 44% on the previous year, to \$86 million in 2017. Discussions with senior staff at the University confirmed that the increase in international student enrolments was planned and supported by an injection of funding into international student recruitment especially around 2016-17. Since that time, there has been a change of leadership with a new Vice-Chancellor and a new Provost.

The Strategic Direction Brochure engages with the tension between, on the one hand, growing international student numbers to raise funds and be competitive financially, and, on the other, the maintenance of distinctive offerings in areas of competitive advantage of intrinsic value. It includes statements such as "we don't need to grow indefinitely" and "we have work to do to ensure international students are welcomed and supported" (pp 5-6). Comments raised in interviews and in the confidential submissions to the reviewer outlined concerns in relation to the sustainability of the growth phase and the need for greater teaching, social and English language support for international students currently studying at UTAS.

1.3 Sustainability of International Student Growth

UTAS, as demonstrated in its Strategic Direction Brochure, is grappling with the issue of sustainability of rapidly increasing international student enrolments. The sector-wide issue was thrown into national prominence by a recent report by the ABC's Four Corners Program (6 May 2019), which has been followed by a request from the Higher Education regulator, the Tertiary Education Quality and Standards Agency (TEQSA) to all universities for their policies and reports relating to international student admissions and performance. In that respect, this review is timely and offers several recommendations for improvement.

1.4 Methodology of the External Review

This review has taken place in a short time-frame and consists of an analysis of policy practice and governance, essentially as a desk audit using existing documentary information. The documents were supplemented by extensive statistical analysis undertaken by the Chief Strategy Officer on student performance by basis of admission; two days of staff interviews in Hobart on 20 and 21 May 2019; and by several confidential submissions emailed directly to the reviewer following an announcement by the Provost.

External Review Commendation 1

UTAS is commended for its proactive stance in calling this review at short notice, encouraging submissions from a wide variety of stakeholders, and ensuring an open but confidential process.

2 Recruitment and Admissions Policies, Processes and Practices

UTAS requested the external review to consider:

Recruitment and admissions policies, processes and practices pertaining to international applicants to the University of Tasmania, assessed in the context of Australian legislative and regulatory requirements.

2.1 Admissions Policy

UTAS has an Admissions Policy, which was approved in December 2017 and is due for review by December 2020.³ The policy applies to admission to accredited coursework courses and to all staff involved in the admission processes and all applicants. It does not apply to applicants for research degrees.

The objectives of the policy are to:

- affirm the University's commitment to increasing higher education participation opportunities for prospective students from diverse backgrounds and learning experiences,
- define the minimum requirements for admission to courses offered at the University, and ensure that these requirements are set appropriately in line with the academic demands of each course and the University's standards of academic excellence, and
- ensure that admission decisions and entry arrangements are merit based, consistently applied, and conducted in an equitable, transparent and timely manner.

The reviewers received no complaints about the Admissions Policy per se. The Admissions Policy has a preliminary section on "relevant legislation" that does not include the Higher Education Standards Framework (Threshold Standards) (2015) (HESF). Section 1 of the HESF pertains to Admission, with Standard 1.1.1 particularly pertinent as it requires:

Admissions policies, requirements and procedures are documented, are applied fairly and consistently, and are designed to ensure that admitted students have the academic preparation and proficiency in English needed to participate in their intended study, and no known limitations that would be expected to impede their progression and completion.

³ https://www.utas.edu.au/data/assets/pdf_file/0005/31199/Admissions-Policy-December-2017.pdf

External Review Recommendation 1

It is recommended that UTAS include reference to the HESF in the “relevant legislation” section of the Admissions Policy.

2.2 Academic and English Language Standards

As would be expected, the UTAS Admissions Policy requires applicants to meet both academic and English language proficiency (ELP) standards. For undergraduate courses, these are listed as:

“3.2.3 Undergraduate Degree Entry Requirements

- a. To be eligible for entry into undergraduate degree courses, an applicant must have attained at least the minimum academic requirement which is one of:
 - Successful completion of an Australian Year 12 qualification,
 - Successful completion of at least one year in an AQF accredited Certificate IV or above,
 - Successful completion of a recognised pre-degree or pathway course at University,
 - Successful completion of an equivalent qualification or course of study as determined by the University,
 - Attainment of specified results in a recognised aptitude test, or
 - Relevant work experience at a stated level and duration.
- b. Additionally, the University may establish minimum grade requirements or achievement levels for admission to a course.”

And for postgraduate courses:

“3.2.4 Postgraduate Coursework Entry Requirements

To be eligible for entry into postgraduate coursework courses, unless other specified, an applicant must have attained at least the minimum academic requirements which are:

- Successful completion of a recognised undergraduate or postgraduate coursework degree, or equivalent, or
- Relevant professional work experience at a stated level and duration, or
- A combination of recognised learning and relevant work experience

The University may establish minimum grade requirements or achievement levels for entry to a post graduate coursework course.”

These academic requirements are relatively standard for the sector and allow flexibility in e.g. the admission of mature-age students.

2.3 English Language Proficiency Requirements

The Admissions Policy includes a statement under General Entry Requirements (Clause 3.2.1) that “applicants must meet English language proficiency requirements, where specified, in accordance with approved English proficiency guidelines”.

The Admissions Policy contains very little information within the policy itself about ELP requirements. It states at Clause 3.2.8:

“3.2.8 Minimum English Proficiency Requirements

- a. The University may set higher English language proficiency for entry into a course with the approval of the University Learning and Teaching Committee; or if the course accreditation requirements demand so.
- b. An applicant may meet the required English proficiency requirements through equivalent learning as approved and set out by the University for a course or study level.”

The actual ELP requirements for admission are contained in the English Language Guidelines. It would be helpful if the ELP Guidelines were included in the Supporting Documentation (Section 6) of the Admissions Policy, which currently states “Not applicable”.

External Review Recommendation 2

It is recommended that UTAS include reference to the English Language Guidelines in the “Supporting Documentation” section in the Admissions Policy.

2.4 Delegations of Authority to Change Admission Requirements

The UTAS Admissions Policy at Clause 3.1.3 states that:

“The University reserves its right to review the admission requirements for a level of study, for a course, or a unit at any time. The amendment of these requirements will be subject to approval by the relevant organisational unit and/or Academic Senate. “

It appears possible that this capacity to change admission requirements by “the relevant organisational unit” may be a source of inconsistency that could be more closely defined in policy. The phrasing above in Clause 3.1.3 of “approval by the relevant organisational unit and/or Academic Senate” is loose (particularly “and/or”), and appears inconsistent with Section 4 “Responsibilities” where the responsibilities of Colleges are noted as “Defining and reviewing the entry requirements for their courses, **and seeking approval from Academic Senate**”.

It is also pertinent to note here that course entry requirements are part of the Council delegations to Academic Senate. These delegations are contained in Ordinance 13, Clause 4.2a “Approval of proposals from colleges and faculties, institutes, centres and schools relating to awards, including: course duration, content and structure; **entry requirements**; methods of delivery and assessment; names and abbreviations of units and courses”, and in 4.2d “power to make rules of awards and **rules relating to admission**, academic assessment and student progress”. These delegations are repeated in the Delegations Policy, Clause 3.5.

A range of people, however, claimed in interviews that the delegations for approval to change admission requirements are defined in the Delegations Schedule to Rule 6 as being with the Executive Dean, which in the case of most international admissions, is further delegated to the Manager, International Admissions (although this does not apply to some courses, e.g. Medicine). There are individual “International Assessment Guidelines per Course” of which three examples were provided to the reviewers, some of which list the Organisational Unit as the delegate rather than a position (such as Executive Dean).

However, the reviewers found the Schedule to Rule 6 (Admission, Assessment and Student Progress Rule) was less than clear to support the belief that such a delegation exists, although there are delegations to the Executive Director, Student Operations in relation to Withdrawal/Revocation of Admissions; to the Chief Operating Officer for Refusal of Admission and to the Executive Dean for Deferral of Enrolment. It may be that this assumption of a delegation to change admission requirements is a matter of custom and practice.

The reviewers found no evidence of capricious changes of admission requirements by organisational units. Nonetheless, these responsibilities are not well known, and not easy to find. Greater clarity could be achieved in the Admissions Policy if it stated that all changes in admission requirements for courses should be approved by Academic Senate, and if all delegations were centralised in a register or schedule (considered further below in Section 2.5).

External Review Recommendation 3

It is recommended that UTAS clarify in the Admissions Policy that all changes in admission requirements for courses must be approved by Academic Senate.

2.5 Delegations Policy

It is noted that the UTAS Delegations Policy was approved in December 2017 with a review date by June 2018. This is an unusually short review period, which has been exceeded, and the Delegations Policy is now a year beyond its review date. The Delegations Policy does not include academic delegations, although the Policy includes a small section (3.15) on “Delegations embedded in Policy”, none of which relate to admissions or the student lifecycle. The Delegations Policy also lists five schedules of

delegations in clause 3.16, none of which are academic. Academic delegations are not included in the Delegations Register.

The Delegations Policy is a good example of the complexity of the Ordinances, Rules, Policies and Guidelines of UTAS, and the difficulty of tracking the relevant delegations within the University's framework. It is noted that the Academic Senate, as the key body responsible for academic governance, is required by Paragraph 6.3.2c of the HESF to provide academic oversight by "confirming that delegations of academic authority are implemented". The complexity of the framework around delegations and the fragmented location of academic delegations renders such a task unmanageable. In order for the Academic Senate to fulfil its compliance responsibilities in relation to academic delegations, these need to be codified and brought together in a schedule or register and then considered as part of the overall Delegations Policy, Register and Schedules. While beyond the immediate scope of this report, it is recommended that UTAS also consider a simplification of its policy framework by reducing the number of levels of documents to enhance usability.

External Review Recommendation 4

It is recommended that UTAS implement a simplification of its policy framework and a reduction in the numbers of levels in the hierarchy of documents to enhance usability.

External Review Recommendation 5

It is recommended that UTAS codify all academic delegations and that they are brought together in a schedule or register and subject to at least annual review by Academic Senate.

The role of the Academic Senate is considered further in Section 5 of this report.

2.6 English Language Guidelines

Updated English Language Guidelines were approved by the Academic Senate on 1 June 2018 as outlined in the first textbox below.

The Executive Director, Student Operations, confirmed that the English Language Guidelines were updated in order to both reflect current admission practices at UTAS and some competitor institutions, and to increase the speed of turnaround of student applications.

The impact of these less stringent requirements is to be assessed by the University Learning and Teaching Committee (ULTC) in July 2019 to enable a full year of data to be available. An extract of the relevant ULTC action items is provided in the following textbox.

The guidelines have been updated to reflect the current scenarios in which applicants present for admission where a request for special consideration is made to the relevant College on a regular basis. Additionally amendments have been included to support the onshore market aligning with other Australian institutions and their approach to English language recognition to allow UTAS to remain competitive in the market.

The revised guidelines articulate a set of scenarios which, if endorsed, will allow Student Operations to make an assessment for entry within the revised guidelines, resulting in improved turn-around time and consistency of decisions. The key amendments to the guidelines are as follows:

1. Addition of a discretionary period of six months on an official English Test expiry in relation to course commencement.
2. Waiving the 24 month validity period for applicants who reside and study in a country where the official language is English – to be determined by <http://dfat.gov.au/geo/pages/countries-and-regions.aspx>
3. Where entry is granted on the basis of Mode of Instruction = English, a reduction of required period of study from 24 months to 12 months
4. Applicants who have met the English requirements at another Australian Institution at the same level as the chosen course at UTAS will not be required to provide further evidence of English ability to be considered for entry
5. Inclusion of identified courses (Appendix B) where an approved English test is required and other methods of meeting the English requirement will not be considered.

The requirement to monitor the Guidelines following approval was agreed at the University Learning and Teaching Committee on 4 May 2018. An action was assigned to the Manager, International Admissions to report back on the success of students admitted under the Guidelines in 6 months.

ULTC Actions Arising following May 2018 meeting

4 May 2018	3.2 English Language Requirements	Report back to the Committee in 6 months on the success of students admitted under these Guidelines. This update to include longitudinal data which provides information on student performance and success as a standing report.	Manager, International Admissions	Pending
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Following discussion with the Chair later in the year, it was agreed that the review needed to encompass both Semester 1 and Semester 2 course intakes (there are many courses that are not available in Semester 2, including high-stakes health courses). As such it was agreed that the report would be presented to the 31 July 2019 ULTC meeting following the release of Semester 1 results in early July to cover the full range of intakes.

The ULTC Business Arising/Action List was updated at the February 2019 meeting to reflect this discussion, and the reporting item was added to the ULTC Work Plan for delivery in July 2019.

ULTC Actions Arising following February 2019 meeting

4 May 2018	3.2 English Language Requirements	Report back to the Committee in 6 months on the success of students admitted under these Guidelines. This update to include longitudinal data which provides information on student performance and success as a standing report.	Manager, International Admissions (Rochelle Finearty)	Will Report to 31 July 2019 ULTC Meeting – Reporting Item has been added to the ULTC Work Plan. Closed.
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The revised 2018 ELP Guidelines constitute a loosening of requirements, allowing a longer period before expiry of official English tests; reducing the required study period in English where Method of Instruction (MOI) is used as the basis for assessing ELP; and removing additional English requirements for applicants who have studied at another Australian institution. Some of these Guidelines have been revoked by executive order in May 2019 (see Section 3.6).

The Executive Director, Student Operations, and the Manager, International Admissions have the capacity for some discretion in relation to multiple sources of evidence, and they jointly assess borderline individual cases for admission. In the last year, 27 such assessments have been undertaken on individual cases, where a range of evidence has been brought to bear, particularly on the determination of English Language Proficiency (ELP). In interview with various staff members, this assessment process was often seen as the power to “waive” requirements, whereas it is an assessment of multiple forms of evidence to determine whether in combination they meet the admission requirements. It appears to have been consistently applied and used in a small number of cases compared to the total student cohort.

2.7 English Language Proficiency Policy

UTAS has an English Language Proficiency Policy⁴ which was approved in December 2014 and was due for review by December 2017. It was amended in December 2017 to reflect College structure and nomenclature; however, it is still listed as requiring review by that date. The policy applies to admission for all domestic and international students, including Higher Degree Research students, and to all staff and to all provisions and processes from admissions through to graduation.

The objectives of the policy are listed to:

- ensure that national regulatory and legislative requirements in relation to English language proficiency are met, and that all provisions in relation to English language proficiency are aligned with good practice principles;
- ensure that there is sufficient resourcing for assessment and teaching of appropriate English language proficiency;
- ensure that English language proficiency requirements for entry are set such that all students have an appropriate level of English language proficiency to participate effectively in their studies on entry;
- ensure that appropriate English language proficiency pathways are available to students who do not meet these entry requirements;
- ensure that throughout their degree program, all students are provided with explicit opportunities for ongoing development of appropriate English language proficiency for academic, professional and social communication;

⁴ https://www.utas.edu.au/data/assets/pdf_file/0007/636919/English-Language-Proficiency-Policy-December-2017.pdf

- ensure that all University of Tasmania students are informed about their responsibility to continue to develop English language proficiency throughout their courses of study and to engage with the opportunities that the university provides.

The English Language Proficiency Policy includes a commitment to ensure, that:

- all activities and provisions in relation to English language proficiency are evidence-based, regularly evaluated, communicated to all stakeholders, and take into account current good practice, including but not limited to the DIICCSRTE⁵ Good Practice Principles for English language proficiency for international students in Australian universities;
- all activities and provisions in relation to English language proficiency are adequately resourced.

There are other good practice principles included in the policy, including, in relation to ELP requirements for entry, that:

- are regularly reviewed, and informed by the collection, analysis and dissemination of internal data and by current research;

and, in relation to ongoing development for ELP for degree program students, that:

- Embedded and co-curricular opportunities relevant to the English language proficiency development needs of particular programs, individuals and cohorts are provided;
- There are professional development opportunities for academic staff in relation to developing students' English language proficiency.

Within the English Language Proficiency Policy there is provision for pathways:

3.3 English Language Proficiency pathways

- Applicants who do not yet meet the English language proficiency entry requirements for their degree are given information about pathways within the University of Tasmania;
- Applicants who do not meet entry-level requirements for University of Tasmania pathways are given information about other options;
- Development towards degree entry-level English language proficiency within University of Tasmania pathways is clearly mapped;
- Entry, eligibility and exit requirements for pathway courses, where applicable, are regularly reviewed.

⁵ The then Department of Industry, Innovation, Climate Change, Science, Research and Tertiary Education, which existed briefly in 2013.

The English Language Proficiency Policy Section 4 “Responsibilities” lists a wide variety of areas and units responsible for various aspects of the policy including the University to appoint “a leader to ensure the policy is adequately resourced and is implemented” and to have “oversight of collection, analysis and dissemination of all relevant data”. Various other responsibilities are assigned respectively to the Centre for University Pathways and Partnerships, the Student Centre, Colleges and Academic Units, the Student Evaluation, Review and Reporting Unit, the Tasmanian Institute of Learning and Teaching and the Graduate Research Office.

Presumably the leader appointed by the University is the Deputy Vice-Chancellor – Global, but the wide span of responsibilities across numerous groups for ELP makes it difficult to track progress as the process is not centralised.

The English Language Proficiency Policy is replete with excellent principles in relation to evaluation and reporting, professional development of staff, support for international students and resourcing of related matters. It is in fact a policy with much broader implications than solely ELP, such that its title is somewhat misleading, as it addresses many of the required standards for student support legislated in the ESOS Act. If the policy were to be reactivated and implemented, its revival would address many of the issues of performance reporting and student support that are currently areas of concern and risk as outlined in Sections 3 and 4 of this report.

External Review Recommendation 6

It is recommended that UTAS review, update and implement the English Language Proficiency Policy in line with sector good practice, and in that review, consider whether its title is still appropriate, and that responsibilities are more closely defined.

2.8 Other Relevant Policy Matters

Rule 6 Admissions, Assessment and Student Progress

Rule 6, mentioned previously in Section 2.4, is also concerned with Credit and Recognition of Prior Learning (RPL), with the requirement given in Part 3:

PART 3- CREDIT AND RECOGNITION OF PRIOR LEARNING

3.1 Credit in a course may be granted through recognition of prior formal learning in a unit, course or qualification, or informal learning not undertaken through a recognised educational institution. Assessment of individual applications must:

- (a) determine the extent to which the applicant's previous learning is equivalent to the learning outcomes of the course to which they have been admitted;
- (b) be undertaken by academic or teaching staff with expertise in the subject, content or skills area, as well as knowledge of and expertise in Recognition of Prior Learning assessment; and
- (c) be recorded and advised to the applicant as to the outcome in a timely manner.

RULE NO 6 - ADMISSION, ASSESSMENT AND STUDENT PROGRESS RULE

The requirement for RPL and Credit to be assessed by academic staff is sound, and the reviewers were advised that this occurs where there are exceptional circumstances not recorded on the Credit Precedent Database. This is in line with sector practice, where professional staff are empowered to make decisions within existing guidelines and precedent.

An enhancement to this rule would be to include a statement to reflect Para 1.2.2 of the HESF which requires that:

“Credit through RPL is granted only if

- a. students granted such credit are not disadvantaged in achieving the expected learning outcomes for the course of study or qualification, and*
- b. the integrity of the course of study and the qualification are maintained.”*

External Review Recommendation 7

It is recommended that UTAS include in Rule 6 Admission, Assessment and Student Progress Rule, Part 3 a statement that Credit and RPL will be granted in accordance with Paragraph 1.2.2 of the HESF to ensure that students are not disadvantaged and that the integrity of the course of study and qualification are maintained.

Academic misconduct and integrity

One of the issues raised by a recent Four Corners program and the object of a request for information to all Universities by TEQSA relates not only to admission and English

language but also to the claims that students with low entry standards (both academic and ELP) are more prone to breaches of academic integrity.

UTAS has Ordinance No 9 Student Discipline which deals with academic misconduct which has processes, procedures, penalties and requirements for recording. The Ordinance was approved by Council in February 2003 and has been amended by resolutions in 2017 and 2018, although the content of these resolutions is not specified.

An improvement to the Ordinance would be the adoption of an escalating series of offences and penalties. While an escalating series of offences is clear, dealt with by staff at different levels, the penalties which may be applied are varied. At present, the penalties specified in Clause 3.2.8 for an offence overseen by an academic misconduct committee, are stated as follows:

The committee may, if it finds the allegation of academic misconduct made out, impose one or more of these penalties –

- (a) a reprimand;
- (b) a reduction in or cancellation of the marks allocated to the student for the particular component of assessment to which the academic misconduct relates;
- (c) deeming the student ineligible to sit the final examination, or the awarding of a lower grade or failure to the student, for the unit to which the academic misconduct relates;
- (d) a requirement that the student satisfactorily completes additional work or alternative assessment tasks;
- (e) the imposition of probationary, assessment or other enrolment conditions;
- (f) a fine of not more than \$500;
- (g) the exclusion of the student from the university, and suspension of their enrolment, permanently or for any period that it thinks appropriate.

While the committee is also required by Clause 3.2.9 to “take into account penalties imposed previously in the University in similar circumstances”, Clause 3.2.8 as written does not provide the clear statement of penalties which has become common in most Australian universities, and hence provides potential for variation in application. Similarly, less serious offences are still, according to this policy, determined by the Head of Academic Unit with a range of penalties.

TEQSA has produced a Guidance Note on Academic Integrity⁶, as well as a Good Practice Note on Contract Cheating⁷ which are useful recent resources. The reviewers heard that this variability in penalties for academic misconduct had been considerably

⁶ <https://www.teqsa.gov.au/latest-news/publications/guidance-note-academic-integrity>

⁷ <https://www.teqsa.gov.au/latest-news/publications/good-practice-note-addressing-contract-cheating-safeguard-academic>

reduced by a more centralised approach, but this does not yet appear to be evident in the policy framework.

External Review Recommendation 8

It is recommended that UTAS update Ordinance No 9 Student Discipline, to codify more centralised practices and penalties occurring within the University and making reference to recent TEQSA Guidance and Good Practice Notes relating to Academic Integrity.

International student policies related to the Education Services for Overseas Students Act (ESOS)

UTAS has a range of policies related to provision for overseas students as a requirement of the Education Services for Overseas Students Act (ESOS). These include the International Student Enrolment Policy, the main concern of which is for students to maintain full enrolment; the International Student Transfer and Release Policy, which specifies requirements under which students may obtain a release to transfer between providers, and the Full Fee Paying Overseas Student Enrolment Policy, which has not been viewed by these reviewers, as it is currently out for internal review and comment.

UTAS also has policies related to Agent Management, as Education Agents are significant brokers in providing students to the University. A key requirement of ESOS Act Standard 4 is the requirement to manage activities and performance of education agents, and to take corrective action if required:

The ESOS Act, Standard 4 states:

- 4.2.3 the registered provider's processes for monitoring the activities of the education agent in representing the provider, and ensuring the education agent is giving students accurate and up-to-date information on the registered provider's services
- 4.2.4 the corrective action that may be taken by the registered provider if the education agent does not comply with its obligations under the written agreement including providing for corrective action outlined in Standard 4.4
- 4.2.5 the registered provider's grounds for termination of the registered provider's written agreement with the education agent, including providing for termination in the circumstances outlined in Standard 4.5
- 4.2.6 the circumstances under which information about the education agent may be disclosed by the registered provider and the Commonwealth or state or territory agencies.

An Agent Monitoring Working Group has been established to monitor agent performance and compliance aspects of agent relationships (as stated in the

International Student Recruitment Team's Minutes and Action items dated 29th March 2018) with bi-annual meetings held in March and September.

Although this analysis has been cursory, it appears that overall UTAS has a satisfactory policy framework in relation to relevant aspects of ESOS compliance such as student enrolment and transfer and in the management of agents.

External Review Commendation 2

UTAS is commended for its comprehensive suite of ESOS-related policies.

3 Standards of English Language Competence of UTAS Students

UTAS requested the external review to consider:

The standards of English Language competence required of incoming students and the comparability of those levels between the University of Tasmania, and like institutions in the Australian university sector.

3.1 UTAS Admissions Policy English Language Guidelines

The UTAS English Language Guidelines for entry were approved by ULTC and Academic Senate in May/June 2018. UTAS English language proficiency requirements are expressed using IELTS as the preferred measure and are used in conjunction with approved test equivalencies and country specific requirements. The requirements apply to all undergraduate and postgraduate (coursework) programs. The Guidelines include tables of equivalencies of other language tests at various IELTS levels at Appendix A (e.g. TOEFL, Navitas English, Cambridge English Advanced); of country-specific alternatives, (e.g. for France 12/assez bien (good) in English at Baccalaureate level completed within 5 years of UTAS program commencement); and of UTAS courses with higher ELP requirements. The Guidelines include courses with higher ELP requirements but not those with lower ELP requirements, which are for entry to Advanced Diplomas.

UTAS courses with higher ELP requirements (listed in the Guidelines as Appendix B) include e.g. for undergraduate and postgraduate studies in Education, a minimum requirement of IELTS 7.5 (no individual band for listening and speaking less than 8.0, and writing and reading no less than 7.0), and for Bachelor of Medicine/Bachelor of Surgery a requirement of IELTS 7.0 (no individual band less than 7.0). At present seven degrees and all specialisations in Education have ELP requirements higher than standard entry. These are: undergraduate courses in Bachelor of Dementia Care, Bachelor of Social Work, Bachelor of Medicine/Bachelor of Surgery, and all specialisations in Education, and at postgraduate level, Clinical Pharmacy, Pharmaceutical Science, Education, Public Health and Social Work.

The English Language Guidelines, while providing the information on the courses which require ELP requirements above the norm, do not clearly state what the norm is, and neither does the Admissions Policy.

It is not easy to find the actual requirements for ELP in any one specific course. For example, in searching on the University website for the ELP requirements for the Bachelor of Business, the viewer is encouraged to click links such as course requirements, but numerous clicks through the course outline and other information led

back to the same place without finding the ELP requirements. UTAS is not alone in this regard, as many universities and Higher Education Providers appear to make access to information quite difficult, and it is frequently necessary (although not at UTAS) to provide contact details in order to access required information.

It is understood that the University website as a whole is to undergo a major overhaul and this course of action is essential to ensure appropriate transparency of information in accordance with HESF Standard 7.2.2 Information for Prospective and Current Students, particularly Paragraph 7.2.2d which includes information on admission. This redevelopment of the website will be welcomed by many staff.

UTAS “launched a new Chinese language website hosted independently in mainland China in November 2015”⁸ but the impact of this is unclear as no evaluation appears to have been undertaken. It is not known, for example, whether it has contributed to the increase in Chinese enrolments; whether a webpage in Chinese might encourage more students with low levels of ELP to apply to the University; who are its major users, e.g. parents, agents or potential applicants; or whether its contents have been kept accurate and up-to-date since its launch.

External Review Recommendation 9

It is recommended that UTAS review and update its website as a matter of urgency to enhance usability and information transparency for potential applicants and other users, and as part of that to evaluate the impact and accuracy of the Chinese website.

3.2 Course-by-Course Requirements

It is recognised that IELTS or equivalent is not the only indicator of ELP or of eventual success for students achieving learning outcomes, nor that this is an issue specific to UTAS.

There are some clear examples of courses which require greater verbal skills than IELTS 5.5 or equivalent, and others with technical requirements which may require overall higher ELP scores on entry. It is recommended that Schools and Colleges identify those courses with higher requirements and put forward proposals to Academic Senate for higher ELP requirements on a course-by-course basis, identifying where appropriate and evidenced, the need for higher band scores e.g. in speaking and listening.

External Review Recommendation 10

It is recommended that UTAS lift its ELP admission requirements on a course-by-course basis, both undergraduate and postgraduate, particularly for courses

⁸ <https://blogs.utas.edu.au/international/2015/11/utas-launches-australian-universities-first-independent-chinese-hosted-website/>

with specialised requirements for vocabulary/terminology through submissions from Schools and Colleges to Academic Senate.

3.3 Basis of ELP Admission

IELTS or other formal tests of ELP are by no means the only basis of admission used by UTAS and other Australian universities. UTAS, since calling this review, has undertaken significant forensic data analysis of its admissions, managed by the Chief Strategy Officer. A preliminary analysis presented to the reviewers in May 2019, showed that in 2018:

- 46% of international students undertook formal testing, of which 34% took the formal IELTS test; 9% Pearson Test of English; and 2% TOEFL;
- 50% of international students undertook informal testing which came under the heading “Other Form of Testing which satisfies the Institution”;
- 3% of international students undertook no test.

The proportion of students entering with informal testing has remained consistent over the period 2016-2019.

- Within the category of “Other Form of Testing which satisfies the Institution” the following was noted:
 - 36.4% Other Mode of Instruction (MOI)
 - 7.7% ELC
 - 6.4% Countries where English is the primary language
 - 3.4% Enrolled in 2+2 courses where there are articulation arrangements.

The very large “Other MOI” category makes up one-third of international students. In 2018 there were 919 students admitted on this basis, of whom 531 came from China, excluding Taiwan, and the Special Administrative Regions (SARs) of Hong Kong and Macau, i.e. 58% from mainland China and another 3% from Taiwan and the SARs.

The data analysis undertaken has been extremely helpful in understanding the basis of admission which fills an important gap in understanding international student performance by cohort and the University is to be commended on this work.

External Review Commendation 3

UTAS is commended for its recent forensic data analysis of international student admissions by country, level of study and basis of admission, which will form a sound basis for further data-driven decision making.

3.4 Interim Working Committee to Oversee English Requirements in Admissions

UTAS established a senior Interim Working Committee in May 2019 (led by the Provost, the Chief Operating Officer and the Executive Director Quality and Standards) to oversee English requirements in admissions until the external review is complete and its recommendations are introduced. As a result, UTAS will no longer be using alternative paths effective immediately, including accepting MOI letters, for future students not already in the admissions process.

An email establishing the Interim Working Committee confirms an immediate tightening of admissions on the basis of MOI.

The University recognises that these are more onerous requirements that may affect applicants in process, and will affect new applicants for Semester 2, 2019 and future intakes. This directive from the Executive is in the process of implementation. It is of key significance to student recruitment as it will result in a reduced volume of international student recruitment. A recommendation about this directive is included in Section 4.5.

4 Student Performance

UTAS requested the external review to consider:

The educational efficacy of these and other relevant standards, evidenced in the subsequent performance of student cohorts entering the University within various admissions categories, to undertake degree study.

4.1 International Student Performance

In undertaking this external review, the reviewers requested standard reports of performance by cohort and by admission category. The University was initially unable to supply such reports as they were not standard and had not been regularly produced for either the Executive leadership and management with operational responsibility for international admissions and recruitment, or for the Academic Senate as the governance body with responsibility for oversight of academic quality and outcomes.

The lack of standard reports by cohort and basis of admission constitutes a failure of compliance with HESF 1.3.5 “Trends in rates of retention, progression and completion of student cohorts through courses of study are monitored to enable review and improvement”. The failure to ensure systematic reporting and monitoring also constitutes a substantial risk of non-compliance with HESF 1.1.1 which requires that “Admissions policies, requirements and procedures are documented, are applied fairly and consistently, and are designed to ensure that admitted students have the academic preparation and proficiency in English needed to participate in their intended study, and no known limitations that would be expected to impede their progression and completion”. The risk of non-compliance with HESF 1.1.1 exists because the rates of progression and completion of international cohorts and more specific cohorts defined by basis of admission have been, up to now, essentially opaque to the institution.

The Academic Senate has a process of review of course performance reports which are considered by ULTC. However, these have not been consistent, and the reviewers were told that the loop has not always been closed on required improvements in performance, although this has not been verified by reference to committee minutes. The reviewers were also told that performance issues have not always been raised to Academic Senate and not necessarily in a timely fashion. The capacity to report performance even by domestic vs international cohorts through the Business Intelligence (BI) system has only very recently (May 2019) become possible. This means that it has been difficult to identify cohorts by mode of admission whose performance has been weak, and therefore impossible to identify cohorts at risk through evidence-based data. The lack of such BI suggests that UTAS has been unable to be compliant with HES 1.3.4 which requires Higher Education institutions to have “Processes that identify students at risk of unsatisfactory progress and provide specific support are implemented across all

courses of study”. Other problems of compliance with Academic Governance requirements are considered in Section 4.

The Chief Strategy Officer and his team have worked tirelessly to develop appropriate reports of student performance by admission cohort since May 2019 and are commended on this work. This review recommends that standard reports of performance by cohort, including by basis of admission, must form a regular feature of reporting to Academic Senate on a semester basis and inclusion in its annual work plan. These reports should form the basis of review and improvement, with use of sub-committees, limited-life working groups and short-term action plans as appropriate.

External Review Recommendation 11

It is recommended that UTAS must include student performance reports by cohort including at minimum, domestic and international students, by country and basis of admission, and students at risk as regular reports each semester to Academic Senate.

4.2 International Cohort Performance by Basis of Admission and Country

The recent analysis of student performance by basis of admission and country is highly instructive, differentiated and compelling.

Student performance by category shows poorer performance for the informal testing routes of the ELC and for students in 2+2 courses. Students entering through formal entry points have a lower than average failure rate, while students entering through informal entry points have a higher than average failure rate in postgraduate/offshore and undergraduate/onshore cohorts.

Other insights gleaned from the Deep Dive analysis included that students who completed their prior studies had a lower average failure rate (17%) than students who did not complete prior studies (25%). Students in the Bachelor of Engineering (Honours) 2+2 also experienced high failure rates. When the problem is broken down, international students entering on a formal English test are performing well, but UTAS identified four areas of distinct underperformance:

- Students coming through the ELC;
- 2+2 students;
- Postgraduate offshore student entering via a MOI;
- Undergraduate onshore students entering via a MOI.

These cohorts are considered in turn in the ensuing sections.

4.3 Students Coming Through the ELC

At present, the Interim Working Committee has not sought to address the high failure rate of this group.

Students coming through the ELC have a packaged offer of a certain number of weeks of English tuition, followed by their degree course. The number of weeks of English language tuition is dependent on the assessment of their ELP which occurs on Day 1 of their enrolment at the ELC. Some ELC students arrive late and so miss the initial testing, but because they have already been assigned to a particular class, this in itself may not be too problematic.

The Director of ELC felt that more targeted rather than general ELP courses would be helpful. The ELC has developed specialised units such as English for Nursing as an alternative to the general UTAS Access Level 7 intensive English 5-week program. It “builds relevant vocabulary and communication skills in nursing and health-related situations” and promotes “comprehension and precise and clear discourse” (English for Nursing unit description). This course has been run once and all students passed, but their subsequent academic performance is not known. The ELC also has outlines for other specialised units particularly relevant to degree courses in Business/Accounting, IT, Science and Engineering but has not had the resources to develop these.

It is possible that more targeted courses for particular cohorts emphasising vocabulary and technical terms would be more valuable than general English courses and consideration should be given to their introduction in disciplines where there is a sufficient cohort. Any introduction of targeted discipline-specific language courses via the ELC should be informed by an evaluation of the English for Nursing pilot, recognising that this is probably a small cohort with particular characteristics. It will also require additional resourcing as at present the ELC has only three staff.

Another approach is to develop language units within courses. These were previously proposed in 2015 as Breadth Units but were not adopted. They include:

- Academic Communication: A Reading and Writing Toolkit;
- Becoming a Global Language Learner: Understanding Language, Learning Languages (working title).

It may be timely to revisit such proposals.

External Review Recommendation 12

It is recommended that UTAS consider the introduction of targeted discipline-specific language courses via the ELC in order to introduce more appropriate vocabulary, or alternatively the development of language units within degree courses, as a means of improving pass rates from ELC students.

4.4 Postgraduate Offshore Students and Undergraduate Onshore Students Entering via a MOI

The Interim Working Committee has put significant steps in place to address the high failure rate of both groups.

The executive order which has addressed some of the concerns of high failure rates by various cohorts of international students and established the Interim Working Committee is based on evidence and data which has not previously been compiled and available in this form for the University. The new requirements that has put in place appear appropriate and necessary in order to assist the University to comply with the overarching requirement of the HESF 1.1.1 that “admitted students have the academic preparation and proficiency in English needed to participate in their intended study, and no known limitations that would be expected to impede their progression and completion”.

The executive order constitutes a variation of admission requirements, for which Academic Senate has delegated authority. Academic Senate also has responsibility for governance oversight of academic quality and outcomes. Therefore, it is recommended that the Directive and the supporting data are fully debated at the Academic Senate, and this external review recommends that Academic Senate should approve the variations in admission requirements.

External Review Recommendation 13

It is recommended that UTAS discuss the recent directive from the Vice-Chancellor and the Interim Working Committee and its supporting data at Academic Senate, and it is further recommended that Academic Senate approve the variations to international student admission requirements, notably the requirements for particular groups to undertake formal ELP testing and the restriction on MOI as the basis for admission.

4.5 Other Factors Affecting International Student Performance

Student performance is affected by a range of factors other than initial entry academic and English requirements. Interviews and submissions raised a number of cognate issues, which can only be dealt with briefly here.

4.6 Student Induction and Late Admissions

Induction is of particular importance to international students and is also required for compliance with ESOS Standard 6.1. New international students have formal orientation sessions face-to-face during Orientation Week. These are of two hours' duration and are supplemented by a .pdf overview, which is quite comprehensive and has many hyperlinks. A briefer version is provided to students who arrive in Week 2, and after that orientation must be done on a 1:1 basis.

The International Student Barometer (ISB) of international student satisfaction produced annually by i-graduate ranks UTAS in the fourth quintile of Australian universities for its formal welcome and in the fifth quintile for University orientation. These are poor results which are not congruent with the University's brand or aspirations.

Student late admissions

UTAS has a high number of late admissions and a number of staff indicated that late admissions are most common in Semester 1 especially if Chinese New Year occurs late in the year. UTAS often has a relatively early start to its academic year which is particularly disadvantageous to Chinese students. It may be possible to consider other starting dates which may also align more closely with other universities.

Some international students have been starting in Week 3 and some as late as Week 4; interviews and submissions stated that such late starts affect hundreds of students. This affects not only orientation, which would hardly be possible on a 1:1 basis if those numbers are accurate, but also adds to high levels of stress as over a quarter of the semester has gone, assignments have been missed and students are still adjusting to finding accommodation and to life in a new environment. There is a demonstrable link between late starting and high rates of failure and progression, and also stress and mental health; a paper on this was presented to the University Quality and Standards Committee (UQSC) in February 2018. It is suggested that UTAS could impose tighter deadlines on late admission or consider other ways of minimising late admissions in order to maximise student success.

External Review Recommendation 14

It is recommended that UTAS consider ways to minimise late admissions of international students, including more stringent enforcement of enrolment rules and even consideration of moving semester starting dates.

4.7 Student Academic and Language Support

The student induction package lists student support for academic and English language study skills. However, on following through to the website for the Student Learning team, there is a warning that says: "we get very busy so please book at least one week ahead". Many interviews and submissions said that in practice there is no effective learning and language support for the thousands of international students, and no mechanism for academic staff to refer students, even in their first semester or first year, for language support. There is a peer learning scheme and a Learning Drop In space, and other support mechanisms and social events e.g. through UTASLife. The anecdotal evidence of 2+2 students accessing Foundation support lends credence to a general lack of available support systems, particularly for enhancing language skills.

The ISB results in the support area show good results in the second quintile of Australian universities for specialised services in the areas of residential and disability support, but unsatisfactory results in the fourth quintile for learning support and the fifth quintile for

language support. It appears that the student support areas are under-resourced to cope with the language, academic and pastoral needs of increasing numbers of students from diverse cohorts, and that UTAS is at substantial risk of not meeting its legislative responsibilities for student support as required by both HESF and ESOS.

Many universities have introduced 24/7 online support systems offered by commercial providers such as Studiosity, which are not writing services, but which assist students to identify improvements. They have been found to be beneficial to both student progress and student satisfaction and may be worth considering for UTAS.

External Review Recommendation 15

It is recommended that UTAS review its provision of learning and language support, particularly for international students, and consider ways to increase that support commensurate with student load, including consideration of commercial online systems.

5 Institutional Oversight and Governance

UTAS requested the external review to consider:

The suitability of institutional oversight and governance of policy relating to international admissions.

5.1 Academic Senate

Oversight and governance of academic policy relating to all admissions, including international admissions, resides with the Academic Senate by delegation from the University Council, as outlined in Section 2.4. Several comments and recommendations have already been made which refer to the complexity of the policy framework, and the need for updating and consistency of documents. Academic Senate is required to have oversight of academic policy as it the overarching body charged with academic governance. The requirements for oversight of academic policy are established in HESF 6.3.2a and the requirements for setting admission (and other academic) standards or “benchmarks for academic quality and outcomes” in HESF 6.3.1b.

External Review Recommendation 3

It is recommended that UTAS clarify within the Admissions Policy that all changes in admission requirements for courses are to be approved by Academic Senate.

Academic Senate has not been a strong voice for collective academic leadership for some time. Its 2017 review focussed on membership, meetings, and relationships with Council and Executive rather than examining compliance with the HESF (2015) which had come into effect on 1 January 2017. The review appeared not to examine policy, agendas and papers in detail but based its conclusions predominantly on interviews. All recommendations from the 2017 review have been implemented (Update provided to Academic Senate meeting of 2 November 2018).

External Review Commendation 4

UTAS is commended for closing the loop on the Academic Senate review of 2017.

An annual Work Plan has been established. However the 2019 Work Plan does not include any policy review or policy review schedule; it does not include consideration of academic delegations; and has no specific mention of academic risk, although it is scheduled to consider reports on elements of academic risk as stand-alone items, particularly attrition, progress and completion; third-party provision, and student misconduct.

Academic risk

Risk is managed at an institutional level by the Audit and Risk Committee of the University Council. Its TOR include “To oversee the risk management framework and ensure that it effectively facilitates the identification, assessment and mitigation of key higher-level risks across the University (including all entities and activities)”. There is no mention of the Academic Senate within the Risk Management Policy as having any responsibility, although “all academic and professional staff” have some responsibility for awareness of risk management principles and bringing risks to attention for mitigation.

The contents of the Risk Register are not widely known. Some senior staff interviewed felt that they were sure issues of ELP for international students were on the Institutional Risk Register, but this does not appear to be the case. However, some of the risks identified in this review are definitely included but under broader headings, such as the overarching risk of “Courses which do not prepare our graduates” which includes potential causes such as: “not having the right academic governance framework in place”; and “poor quality data and information to enable appropriate decisions to be made about course quality”. At present this risk is ranked Moderate as is the risk of “Failure to enable ongoing compliance with the Higher Education Standards Framework”. Some evidence for this risk has been presented in this report.

A more severe risk is headed “Inability to meet students’ evolving needs” including causes such as “lack of available funds or funds not applied with reference to student experience”. This review of international recruitment and admissions practices has highlighted some areas of risk which the University will wish to address, and which are contained within the recommendations. It will also be necessary, however, for the University to consider more broadly how it approaches the concept of academic risk, and how the Academic Senate is included in the Risk Management Framework and Risk Management Policy.

External Review Recommendation 16

It is recommended that UTAS consider its approach to academic risk and ensure that Academic Senate is included in the Risk Management Framework and the Risk Management Policy, and that the academic risk register or schedule is an item for regular review in the Academic Senate Work Plan.

5.2 Risk of Non-Compliance with HESF

From this brief review, it appears that Academic Senate is unlikely to be compliant with HESF 6.3.2a (developing, monitoring and reviewing academic policies and their effectiveness), and 6.3.2b (confirming that delegations of academic authority are implemented). It is also at risk of non-compliance with 6.3.2d (maintaining oversight of academic and research integrity, including monitoring of potential risks) as, although it receives reports relating to academic integrity and misconduct, it does not have an overview of academic risks.

The 2017 Review of Academic Senate commented on the lack of reports and of closing the quality loop. The difficulties experienced by the University in 2019 in providing the required reports on student performance as outlined in Section 4.1, also place the Academic Senate at substantial risk of non-compliance with other paragraphs of HESF 6.3.2, in relation to monitoring, reporting and initiating action for improvement. The relevant paragraphs of Standard 6.3 are: 6.3.2e (monitoring and initiating action to improve performance against institutional benchmarks for academic quality and outcomes); 6.3.2g (evaluating the effectiveness of institutional monitoring, review and improvement of academic activities); and 6.3.2h. (monitoring and reporting to the corporate governing body on the quality of teaching, learning, research and research training).

Much of the monitoring of academic performance at course level occurs at ULTC as well as at Academic Senate. Neither Academic Senate or ULTC receive regular monitoring reports of enrolment, retention, progression and success by cohort (a key requirement of HES 1.3.5). ULTC has oversight of Course Performance Reports but these are often received at a time-lag and Academic Senate does not have full visibility of the process. The Academic Senate review of 2017 also commented that Academic Senate does not have sight of course reviews. Any review of Academic Senate will need to incorporate reviews of its sub-committees and their Terms of Reference and Annual Work Plans, to ensure there is continuing appropriate monitoring and oversight and that items of significance to outcomes and quality are not buried too deeply in the structure of committees.

A suggestion which occurred several times in interviews was the reinstatement of an Admissions Committee. Such a committee is common practice in many universities, and is generally a combination of governance and operations, dealing with policy, standards and quality oversight, but also the operational matters of load, quotas and immediate issues relating to individual admission decisions. It would be standard practice from such a committee to be chaired by the Provost, with reporting both to Executive and to Academic Senate.

External Review Recommendation 17

It is recommended that UTAS undertake a compliance assessment of the Academic Senate and its sub-committees with the requirements of the HESF.

External Review Recommendation 18

It is recommended that UTAS consider the reinstatement of a University Admissions Committee, which may have both governance and operational responsibilities.

While the Academic Senate is responsible for oversight of institutional quality and outcomes, it generally has no specific resources of its own and is dependent for appropriate reports on the operational and Executive arms of the University.

Recommendation 14 has already been made about the regular provision of such reports.

The Academic Senate has also suffered from changes in membership and leadership, and from staff undertaking multiple roles. The current Acting Chair is in post because of the appointment of the previous Chair to a senior Executive position within the University. At June 2019, the Acting Chair has been in post for only two meetings and has no Deputy Chair, which means there is a very substantial committee load including chairing ULTC and all Appeals Committees as well as Academic Senate. This is a heavy workload and very time-consuming; it is also problematic as the same person chairs sub-committees providing recommendations and reports to higher committees. Her substantive post as Deputy Chair of Academic Senate will come to an end on 31 December 2019 and, if this is allowed to occur, there will be further loss of corporate knowledge. Similarly, many of the existing members who have worked through this difficult period will also have terms of membership expiring. Many universities have adopted the practice of having two Deputy Chairs in part to avoid the problem of acting roles and also to share the sub-committee duties. It is suggested that the requirements for expiry of terms be altered in this instance for at least the current Acting Chair, and possible for more members, to prevent this loss of corporate knowledge. It is further suggested that at least one Deputy Chair be appointed as soon as practicable who can continue into 2020.

External Review Recommendation 19

It is recommended that UTAS extend the term of office of at least the current Acting Chair of Academic Senate and appoint at least one Deputy Chair for Academic Senate as soon as practicable.

Addendum

A late submission was received by the external reviewer regarding examinations for the ELC. A suggestion was made regarding ELC exams to have properly invigilated external exams to decrease the opportunity for cheating.