



**GSA submission to the consultation on
proposed amendments to the special
consideration provisions within the
Assessment and Results Policy**

11 October 2019

Executive summary

The University of Melbourne Graduate Student Association (GSA) welcomes the opportunity to provide feedback into the proposed amendments to provisions for special consideration within the University's Assessment and Results Policy.

GSA is the independent representative organisation for all graduate coursework and research students at the University of Melbourne. We are led by an elected Council of 15 graduate students, and on behalf of over 36,000 constituents we represent graduate student interests to the University and wider community, provide facilities and services, deliver events and activities to promote graduate student community and academic excellence, and support over 130 affiliated graduate student groups.

GSA's vision is for a cohesive community that actively empowers graduate students' experience and excellence. Our mission is to contribute to the emotional health and wellbeing of graduate students, and support their striving for academic excellence and transition to work. Following this, GSA believes that special consideration is vital for many graduate students who experience challenges during their studies and need flexibility and support to succeed.

Graduate students at the University of Melbourne are highly intelligent and committed, with a strong drive to achieve excellence. They also live full and often complex lives outside of their study, balancing child-rearing, caring duties, work obligations and other responsibilities. Additionally, the many graduate students with chronic illness, disability or mental illness need to balance the often-unpredictable nature of their health issues with their study and broader life.

The graduate students who need special consideration support during their course are rightly proud of their strength and resilience in succeeding despite challenging obstacles, and simply want the support of their institution to reach their potential. Because of this, GSA strongly encourages the University to approach amendments to special consideration policy and processes within a framework of support and empowerment, rather than with an intent to further limit or restrict eligibility.

As a university that aspires to be a "top-flight" institution in the global higher education sector, GSA would expect to see nation- and world-leading policies that support students to achieve their academic potential. Further, to meet the University's strategic theme of "people, diversity and inclusion, and its goal of "allowing the best minds to have access to the University's educational offering", institution structures must be in place to support students who have great capability but encounter challenges.¹

While this submission is primarily focused on the policy amendments at hand, GSA recognises that the benefits of good policy can only be realised when similarly good processes are

¹Strategy 2030 Discussion Paper, <https://staff.unimelb.edu.au/strategy-planning/strategy-2030>

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developed, followed and resourced appropriately. Therefore, alongside a supportive policy and procedural framework, GSA also encourages the University to invest in staff who are sufficiently skilled and equipped to support the diverse needs of graduate students experiencing challenges in their studies.

GSA would welcome the opportunity for its student representatives and professional staff, along with those of our fellow student association UMSU with whom we have partnered in preparing our submissions, to play a role in further refining and evaluating the special consideration process to ensure it has the best possible outcomes for students and the University.

Summary of recommendations

1. **Approve** change to allow sanctioned faculty academic commitments to be eligible as grounds for alternative examination or assessment arrangements (4.117c in amendments)
2. **Approve** changes to more clearly articulate the circumstances for which a student is eligible for special consideration (4.117 and 4.120 in proposed amendments)
3. **Reject** change that will remove option for students to apply for special consideration for completed assessment tasks (4.131(a) and 4.135 in proposed amendments)
4. **Reject** change that will remove option for “special on special” provision, that allows students to apply for special consideration more than once for a given assessment task (4.136 in proposed amendments)
5. **Formalise** in the amended policy the existing practice that allows students an extra 5 business days to provide supporting documentation after submission of their special consideration application continues
6. **Retain** the current provision for deans to make reasonable adjustments to assessment requirements outside of the special consideration process in order to “provide equality of opportunity to fulfil course and subject requirements” (4.121-4.124 in current policy)
7. **Clarify** the requirement that medical or professional certificates for special consideration must state that “a student was unfit to sit the exam on the relevant date” (4.126 in proposed amendments)
8. **Introduce** greater flexibility for students already on Academic Adjustment Plans to apply for special consideration
9. **Increase** resourcing for ongoing staff with the expertise and capacity to support students facing complex challenges in meeting their academic requirements

Evidence to support recommendations

This submission was prepared by GSA’s Representation Team, who provide dedicated support and advice to GSA’s elected Council and its network of 33 graduate student committee representatives. It was developed in consultation with UMSU, and GSA fully supports and endorses UMSU’s submission to this consultation process. It also draws upon the results of the online survey conducted by UMSU in September 2019, that received 608 responses from graduate students.

In preparing this submission, GSA has chosen to centre the voices of graduate students with lived experience of illness, disability, caring responsibilities and other challenging life circumstances that have required them to seek special consideration. The survey conducted by UMSU included substantial numbers of qualitative responses, indicating great student interest in the topic of equitable special consideration. Of the 245 graduate student respondents who provided comments, 55 shared their lived experience: 26 experience mental illness, 21 have a chronic illness or disability, 5 experienced major grief from the loss of family members or close friends, and 4 have significant caring responsibilities. Another 5 did not specify the nature of their lived experience, but spoke of challenges to completing their assessments.² These experiences are shared as comments throughout this submission.

Special consideration is vital for student equity

Special consideration is a crucial component of ensuring equity for students at the University of Melbourne, and having accessible, equitable and clear policies and processes for special consideration should be a priority for the University.

For this reason, GSA welcomes the proposed changes in 4.177 of the amendments that clearly articulate the circumstances under which students are eligible to access special consideration. Including “loss or bereavement, hardship or trauma” is a particularly important change given that many students are not currently aware that special consideration is available for these circumstances.³ We encourage the University to expand on this positive change by developing communication strategies to inform students of this policy, and in particular make this information available to students accessing the Safer Community website or services.

Likewise, we support the new provision that explicitly provides special consideration eligibility for students engaging in “faculty sanctioned academic activities”. This is a positive step toward supporting students in undertaking activities that enrich their study experience and provide skills for future careers.

In UMSU’s special consideration survey, responses overwhelmingly indicated how important students perceived special consideration to be. Among graduate student survey respondents, 76.6% believe that special consideration was very important, and a further 15.6% regard it was important. Amplifying this, 91.5% of respondents said the proposed changes to special consideration would affect their experience of studying at the University, and over half of the respondents said this effect would be significant.

² Note: some students reported multiple challenging lived experiences

³ *Family Violence and the Special Consideration Policy: A proposal for reform*
https://docs.wixstatic.com/ugd/56c4e1_891ed0fe37af4a5d91636dbd196e2335.pdf

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Even more significantly for its effect on student equity, and the University's ability to educate the "best minds", 43.3% of graduate students indicated that if the proposed amendments were in place as policy, it would have impacted their decision to study at the University.

"As a sufferer of a chronic serious illness that still requires extensive medical management and surgeries, the proposed changes would seriously hinder my ability to complete my studies ... The current policy has ensured that this illness has not prevented me from the success I know I am capable of. Had this policy been in place prior to my enrolment, attending this university, despite all its prestige and honour, would not at all have been a possibility for me."

UMSU special consideration survey, September 2019

Recommendations

1. **Approve** change to allow sanctioned faculty academic commitments to be eligible as grounds for alternative examination or assessment arrangements (4.117c in amendments)
2. **Approve** changes to more clearly articulate the circumstances for which a student is eligible for special consideration (4.117 and 4.120 in proposed amendments)

Proposed changes disadvantage vulnerable students

Removing special consideration for completed assessments directly disadvantages students with mental illness and complex health conditions

GSA strongly opposes the proposed amendments 4.131(a) and 4.135 that would remove a student's capacity to apply for special consideration for an assessment that they had completed. This change, colloquially known as "fit to sit", puts an unreasonable burden on students to judge their capability to complete an assessment or examination to the best of their ability at the very time that their judgement is impaired by illness, trauma or other extreme circumstances.

As the substantial literature into this topic notes, university students experience far higher rates of mental illness and psychological distress than the general population, and academic study itself can directly impact on student mental health.⁴ Because of this, universities have a duty of care to create an environment that actively supports the health and wellbeing of their students.

This proposed amendment runs directly counter to that duty of care, and would actively disadvantage students who are unable to accurately assess their capacity to complete an

⁴ Baik, Larcombe and Brooker, "How universities can enhance student mental wellbeing: the student perspective"

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assessment due to mental illness or distress. Of even greater concern, these changes have the potential to exacerbate students' mental health conditions.

Highlighting the prevalence of mental illness and distress among graduate students, 21% of graduate students who provided comments on the UMSU survey cited mental health concerns as a reason why the proposed amendments would be damaging, as did almost half of the graduate students who cited lived experience of needing to access special consideration.

"The University prides itself on its mental health awareness. As someone with a mental health issue, the proposed fit-to-sit rule is completely unfair. A person with anxiety may, by the nature of their condition, be compelled to attend the initial exam, in fear of their special consideration application being rejected ... The fit-to-sit rule would mean that they would have to accept this mark, even though they were impacted by extraneous, special, and unexpected circumstances."

UMSU special consideration survey, September 2019

Along with the detrimental impact that the "fit to sit" proposal would have on students with mental illness, it would also significantly disadvantage students with other complex health conditions. Graduate students with diabetes, migraines, traumatic brain injuries and other chronic illnesses and disabilities explained in their survey comments that their ability to complete an assessment to their best ability could fluctuate rapidly, and the ability to apply for special consideration after completing an assessment was essential for them to complete their studies successfully.

"Having diabetes means that my blood sugar may change during the exam and impact my performance, but sometimes I am unable to determine if I would still be okay to sit the remainder of the exam. Due to the nature of my blood sugar changing literally all of the time, special consideration needs to remain flexible to account for this. The current special consideration requirements are not up to scratch to accommodate this, and making them even stricter will make it worse. It is disadvantaging people who are already disadvantaged with a chronic condition, who have to apply for special exam arrangements on top of everything else and are already affected by the stresses of exam preparation."

UMSU special consideration survey, September 2019

Removing special-on-special consideration disadvantages students with unpredictable health conditions and victims of violence

As well opposing the removal of the capacity for students to seek special consideration for completed assignments, GSA also strongly opposes the proposed amendment to remove the option for students to apply for special consideration more than once for a given assessment

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task (4.136 in proposed amendments).

The current policy already establishes strict limitations on “special-on-special” applications in clause 4.133:

“Special consideration applications relating to a particular assessment task or variation to assessment for which special consideration has already been granted are only considered in exceptional circumstances and, in those cases, only once.”

Removing even this limited provision means that students who have the extreme misfortune to be unfit for both their original assessment and alternate assessment will have no option but to withdraw from their subject or accept a far lower mark. As the student comments related to the “fit to sit” provision indicate, students with complex health challenges cannot always predict when they will be capable to complete their assessments, and disadvantaging them in this way is a serious blow to equity and accessibility at the University.

“With these changes, my brother who once studied here would’ve been forced to fail, withdraw or accept a lower mark for a subject which he was extremely good at, but extremely unlikely to have an emergency hospital admission the day before his exam (twice). The process was already hard enough”

UMSU special consideration survey, September 2019

Outside of medical considerations, the removal of special-on-special applications would severely impact victims and survivors of family and intimate violence. Respondents of family violence and other forms of assault must adhere to dates within a judicial process when they seek justice for the crimes against them. If these were to conflict with a date for their alternate assessment, a student would be forced to withdraw from their subject or accept a lower mark. Given the University’s commitment to supporting victims and survivors of violence, this situation would be wholly untenable.

Shortened timelines for documentation would make it impossible for some students to access the services they need in the time the University requires

4.126 of the current policy and 4.130 in the proposed amendments both state that an application for special consideration must be lodged “within 4 business/working days of the examination date or assessment due date”.

However, current University practice as outlined on the University’s website states that:

“If you’re unable to supply your supporting documentation at the time of your application, you may apply online and advise in your application when you expect to be able to supply it. We can hold your application for up to five working days while we

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await your supporting documentation.”⁵

Given that the preamble of the proposed policy amendments indicates changed timelines for special consideration applications, GSA expresses grave concern that this current practice will be ceased, and students will have a maximum of 4 days after a due to date to submit their application with all required documentation.

Many students who have complex health conditions or are experiencing serious trauma will simply be unable to access the specialists or professionals within the timeframe stipulated in the policy, especially those who are unable to afford private health services.

Enshrining the additional 5-day timeframe for providing documentation in the policy would make it easier for students to see professionals and acquire the documentation necessary to support their application.

“The proposed changes pertaining to shortening time frames for documentation is especially unfair, given how long waiting lists, even to see your own health-care professional, can be, particularly for those with mental-health conditions in the public mental health system. I urge the university to reconsider these changes.”

UMSU special consideration survey, September 2019

Recommendations

3. **Reject** change that will remove option for students to apply for special consideration for completed assessment tasks (4.119 in current policy, 4.135 in proposed amendments)
4. **Reject** change that will remove option for “special on special” provision, that allows students to apply for special consideration more than once for a given assessment task (4.136 in proposed amendments)
5. **Formalise** in the amended policy the existing practice that allows students an extra 5 business days to provide supporting documentation after submission of their special consideration application continues

⁵ “Special consideration due to unexpected circumstances”
<https://students.unimelb.edu.au/admin/special-consideration/unexpected-circumstances>

Students need greater clarity, flexibility, and support

Many graduate students responding to the survey described the current special consideration system as difficult to navigate, often restrictive and stressful. This correlates with the 2018 findings from the University Services Wellbeing division, that sought to understand the situation of students at risk and provide early intervention. Students who are struggling often lack trust in University systems, and find them to be frustrating, counter-intuitive and punitive.

Unfortunately, the majority of proposed amendments would only exacerbate this sentiment. Beyond rejecting the amendments that GSA have already identified as likely to cause major negative consequences for students, we also advocate for retaining existing policy elements and clarifying amendments to ensure that flexible and suitable support is available, and considering options to improve flexibility and support for students.

“By their very nature, special consideration procedures should allow for and give space to students in need; these changes will only make it harder for students at an already vulnerable point in their life. I have been through special consideration procedures at unimelb in the past and cannot tell you the stress, on top of the initial reasons I applied, I felt going through the process. If these changes were put in place, the stress would’ve been amplified ten-fold.”

UMSU special consideration survey, September 2019

Removal of provision for other requests for adjustments to assessment impedes students’ ability to meet religious, cultural or other major commitments

Clause 4.121 of the current policy states that in addition to the centrally-managed special consideration process, “Upon request from a student, the dean may make reasonable adjustments to assessment requirements for a student with a verified disability, medical or other circumstance (including elite athletes and performers, defence reservists and emergency volunteers) to provide equality of opportunity to fulfil course and subject requirements”. Clause 4.122c clarifies that “significant religious or cultural reasons” are also grounds for adjustments.

It is unclear whether these clauses are intended to be retained in the amended policy, and therefore GSA strongly recommends that they are. This discretion enables deans to provide necessary flexibility to their students in a variety of circumstances, from a perspective that understands the conditions and requirements of their course of study.

It is also the only place within the policy that explicitly allows academic adjustments for religious reasons, and given the breadth of cultural diversity among the University’s graduate student cohort GSA believes it is vital to retain this clause.

Requirement for dates listed on supporting documentation must recognise the impact of incapacity during study period

GSA echoes UMSU's support for the proposed amendment 4.126 that specifies the requirement for medical documents to cover specified assessment dates, as it will reduce confusion around documentation for all parties involved in special consideration.

However, we express concern that in the case of special consideration for exams, the documentation must state that "a student was unfit to sit the exam on the relevant date". This clause as written has the potential to disadvantage students who may be fit on the day of the examination, but were unfit during the study period immediately prior and therefore unable to prepare for their examination. To support genuine equity, this clause must explicitly allow students to apply for special consideration for examinations where their period of impact was in the preparation period.

Students who are already on academic adjustment plans should be given greater support and flexibility in making special consideration applications

GSA supports the inclusion in the proposed amendments of clause 4.122, that states the circumstances under which a student who is already on an Academic Adjustment Plan (AAP) may apply for special consideration. However, particularly in cases where the special consideration application is due to "an acute flare-up of the known condition that prevents a student from completing an assessment task" (4.122(b)), GSA strongly recommends that the evidentiary requirements for the application are lower than would otherwise be the case, and that the student is given greater flexibility in submitting their application.

Students with ongoing challenges that require AAPs are already at a disadvantage when pursuing their studies; providing them with some additional flexibility in cases where this disadvantage is exacerbated is a simple way in which the University can promote equity and support these students to achieve their potential.

Investing in greater skilled staff resourcing will promote student equity and wellbeing

GSA recognises that the special consideration process relies on skilled staff to assess applications, provide support for students with complex needs, and administer adjustments. However as UMSU details in their submission, the current resourcing of the Student Equity and Disability Service, and the frequently restrictive approach to assessing applications, often leads to poor outcomes for students.

To genuinely promote and enhance student equity and wellbeing at the University, there needs to be an investment in staff who have the expertise and capacity to understand and support students facing complex challenges. In particular, in recognition of the thousands of domestic and international graduate students from culturally and linguistically diverse backgrounds, GSA strongly recommends that the University increase resourcing of staff with the skills to effectively and appropriately support these students.

Recommendations

6. **Retain** the current provision for deans to make reasonable adjustments to assessment requirements outside of the special consideration process in order to “provide equality of opportunity to fulfil course and subject requirements” (4.121-4.124 in current policy)
7. **Clarify** the requirement that medical or professional certificates for special consideration must state that “a student was unfit to sit the exam on the relevant date” (4.126 in proposed amendments), to recognise the impact of incapacity during study period
8. **Introduce** greater flexibility for students already on Academic Adjustment Plans to apply for special consideration
9. **Increase** resourcing for ongoing staff with the expertise and capacity to support students facing complex challenges in meeting their academic requirements

Conclusion

GSA believes that ensuring equity and accessibility for all students is a fundamental responsibility for any university, and even more so for one that prides itself on its status as a nation- and world-leading institution. As one part of this responsibility, special consideration policies and processes must be developed and implemented with the intent of supporting the many highly-capable students at the University who encounter serious and complex challenges during their study.

Particularly in the case of graduate students, who frequently already balance their study with the requirements of professional work, families and caring responsibilities, equitable and accessible special consideration is a crucial safety net to enable them to succeed to their potential.

GSA fully supports the University’s recent initiatives and strategic direction to improve student wellbeing and embrace diversity among its student and staff cohort, and so we are gravely concerned by these policy changes that would undermine this direction and increase the challenges faced by many graduate students.

As an alternative to introducing these damaging amendments, GSA invites the University to work with its student associations and their constituents to understand the obstacles that students are currently facing to succeeding in their academic journey, and develop systems and policies that genuinely support student wellbeing and excellence.

References

Baik C, Larcombe W, and Brooker A (2019), “How universities can enhance student mental wellbeing: the student perspective”, *Higher Education Research and Development*, 38:4, 674-687

Later Law Students’ Network (2017), *Family Violence and the Special Consideration Policy: A proposal for reform*

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