

## UMSU Advocacy Feedback

Overall, the Advocacy Service endorses the objectives set out in this proposed policy. However, we provide the following feedback for your consideration.

### Failure to Achieve the Objective

UMSU notes the proposed policy provides for some procedural principles, but we are concerned that these are insufficient to demonstrate how this policy will require conformity with its principles or put into practical terms how this policy ensures compliance with its fundamental obligation to *provide a framework for ensuring appropriate responses to support and ensure the safety of students impacted by a traumatic event that has occurred.*

We acknowledge that further detail may be planned for future development, or intended to sit outside this policy. However, UMSU is concerned that the policy, as it stands now, fails to meet the primary objective put forth in s 1.1. Our reasons for concluding this stem from a number of preliminary observations.

1. Section 2.3 notes this policy is not intended to provide for management of routine student wellbeing concerns. However, the remainder of the policy also fails to indicate how regular operations such as counselling, health, and safety services, may be appropriately made available to students that *do* fall under this policy. As such, it appears to suggest that affected students are not eligible to receive support from University Services pursuant to this policy.
2. Under s 2.4 there is mention of a range of policies alongside which this draft purports to work, including policies to manage student discipline matters. However, the proposed policy does not include any policies that meaningfully and practically support affected students.
  - a. For example, the *Assessment and Results Policy* where the provisions for Special Consideration reside, or the *Enrolment and Timetabling Policy*, where subject withdrawal and amendment and leave of absence provisions reside.
3. The overall tone, content, and delivery of this policy has potential to convey a risk management approach to the issue, which lacks the requisite sensitivity and could reflect a greater engagement with trauma-informed approaches to ensure student safety. This is particularly evident in s 5.3 where the coordination of immediate and post event responses is to be undertaken by the Academic Registrar, but there is no mention of the principles that underpin this approach and how the safety of students is given primacy over risk management practices.
  - a. In this context we are concerned that the failure to adhere to a trauma-informed approach, or an approach that reflects best practice, may have the effect of re-traumatising students by way of poor process.<sup>1</sup>

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<sup>1</sup> See, for example, Productivity Commission 2020, *Mental Health*, Report no 95, Canberra, <https://www.pc.gov.au/inquiries/completed/mental-health/report/mental-health-volume2.pdf>.