

## **THE GOOD, THE BAD AND THE UGLY**

**UMSU submission on Consultation on Proposed amendments to the Special Consideration provisions in the Assessment and Results Policy**

11 October 2019

Dear Policy Network,

UMSU welcomes the opportunity to put forward our views on the proposed changes to the Special Consideration provisions in the *Assessment and Results Policy*.

While we welcome those changes which clarify roles, responsibilities, and the interpretation of terms and conditions related to Special Consideration, we vigorously oppose the proposals which have potential to negatively impact students who already face hardship.

We also welcome this opportunity to elucidate our position beyond the changes proposed, and to address the approach and attitudes which underpin the proposal to change the policy.

In response to the proposed changes to the *Assessment and Results Policy* UMSU surveyed students to determine their views in relation to Special Consideration. The results of this survey will be discussed below; however, direct and qualitative feedback provided by students is presented throughout this submission.

A set of recommendations is set out at the end of this document.

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Manager, Advocacy & Legal  
October 2019

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## SUMMARY OF FEEDBACK ON PROPOSED POLICY CHANGES AS SET OUT IN CONSULTATION DOCUMENT

PROVISION	FEEDBACK/COMMENTARY	STATUS
<p>4.129 Assessment adjustments in response to an eligible application are decided by the dean and can be:</p> <p>(a) a deferred assessment;</p> <p>(b) an extended period for assessment;</p> <p>(c) special arrangements for assessment;</p> <p>(d) additional assessment;</p> <p>(e) resubmission of assessment;</p> <p>(f) adjusted relative weighting assigned to components of assessment where this does not affect learning outcomes or academic standards (applies to shorter assessments only);</p> <p>(g) authorise late withdrawal from the subject.</p>	<p>This contradicts the idea that submitted assessment is excluded from eligibility. How can you be given an outcome of <b>re-submit</b> if submitting makes you ineligible?</p> <p>UMSU supports resubmission of assessment as a positive outcome, but note this is contradictory with the “fit to sit/submit” proposal.</p>	<p>Inconsistent with proposed change but otherwise supported.</p>
<p>4.130 Applications for special consideration must be made prior to or within 4 business days after the examination date or assessment due date and must be supported by documentary evidence that may include:...</p>	<p>We note that this does not represent a change from the current provisions at 4.126. However, in the flagged changes at the beginning of the consultation document, “changed timelines for submission of special consideration applications” are flagged. Read together this suggests an intention that this is proposed to be read narrowly and strictly enforced, meaning students will be required to obtain all documentation within a very short timeframe. Whereas currently the custom and practice is to allow an additional 5 days from submission of the original application to provide substantiating documentation.</p>	<p>Recommend maintenance of custom and practice of allowing a further five days to provide supporting documentation, and additionally recommend this time is codified in policy.</p>
<p>4.131 For the avoidance of doubt:</p> <p>(a) a student who completes a component of assessment in a subject is not eligible for special consideration for that component of assessment;</p> <p>(b) a student who attempts but does not complete a component of assessment in a subject may be eligible for special consideration;</p> <p>(c) a student who does not attempt a component of assessment in a subject may be eligible for special consideration;</p> <p>(d) a student is not eligible for special consideration in a component of assessment where an allegation of academic misconduct for assessment component has been upheld in that assessment component, whether or not the assessment component was completed.</p>	<p>In this provision it is unclear what “complete” means. Does it refer to the submission of an assignment or the collection of an examination booklet or getting to the final station in an OSCL, playing or singing the final note of a performance? This would also preclude the award of retrospective extensions to remove late penalties.</p>	<p>This proposed change is not supported.</p>

## SUMMARY OF FEEDBACK ON PROPOSED POLICY CHANGES AS SET OUT IN CONSULTATION DOCUMENT (CONTINUED)

PROVISION	FEEDBACK/COMMENTARY	STATUS
4.135 An application for special consideration will be refused if the student completed the relevant assessment component.	This creates a risk for students who need to know their circumstances will be eligible before they can decide whether to complete or not.	This proposed change is not supported.
4.136. Special consideration assessment adjustments can only be granted once in relation to a particular assessment component. For the avoidance of doubt this means if a student is further prevented from completing the special assessment, they will not be offered further special assessment for that assessment component in that subject.	See above.	This proposed change is not supported.
4.142. A request for assessment adjustments may be refused if: (a) the assessment adjustments requested are not reasonable; (b) the assessment adjustments mean the student will not meet the inherent requirements of the subject or related course; (c) the request is not made within a reasonable time to allow adjustments to be made; and/or (d) the request is not supported by appropriate documentary evidence.	What is the test for reasonableness? It should refer to the test under Anti-Discrimination/Equal Opportunity legislation?	Clarification required.
4.144 Notwithstanding any provision of this policy, a dean may grant an assessment extension of up to 10 business days: (a) due to unforeseen circumstances that impact on a student during the time allocated for the preparation of an item of assessment; and (b) up until 1 business day prior to the submission deadline or performance date of the assessment task.	This provision could be clearer it is somewhat ambiguous as to whether this refer to the original submission deadline or to the deadline after an extension has already been granted.	Clarification required.

## THE GOOD – CHANGES WHICH UMSU BROADLY SUPPORTS

In addition to the comments in the table above specifically addressing the changes proposed, UMSU supports the following proposed changes which clarify terms of the policy. We further note that many if not all, of these clarifications potentially would have avoided a number of recent disputes, grievances and appeals.

*Allowing sanctioned faculty academic commitments to be recognised for alternative examination/assessment arrangement; e.g. student presenting at an academic/ research conference (4.117(c)).*

This is a useful clarification to obviate bizarre circumstances where an academic unit encourages a student to participate in an activity, but they are then denied accommodation for this purpose.

*Clarification on roles and responsibilities in determining eligibility and outcome (4.128 - 4.129 & 4.140 - 4.141).*

This change should make clear that eligibility decisions cannot be overridden by academic units who are responsible only for determining the manner in which the circumstances are accommodated within the prescribed options.

*Clarification of the short term and ongoing alternative assessment provisions (4.129 & 4.142).*

An exhaustive list of possible accommodations should obviate academic divisions' use of "no appropriate outcome" for students who have been deemed eligible for Special Consideration.

Documentation requirements detailed (4.130 [sic] 4.123?) and the requirement for medical documents to cover specified assessment dates (1.426).

This clarification should remove disputes regarding the types of substantiating documentation, including making clear that alternatives to the University HPR form will be accepted, providing the letter or certificate contains the required information related to the dates of impact.

## THE BAD – INTERNAL INCONSISTENCIES WHICH CONTRIBUTE TO AMBIGUITY

Unhelpfully, several proposed changes are inconsistent or potentially introduce ambiguity.

4.129(e) provides for re-submission as a possible outcome of Special Consideration which is inconsistent with the proposal at 4.131 that any submitted assessment is automatically excluded from Special Consideration. As a stand-alone provision however, UMSU supports the provision to resubmit.

4.144(b) introduces a potential ambiguity with respect to the "submission deadline" and needs to make express whether this is the original deadline, or an already extended deadline, or both.

## REMOVAL OF THE “SPECIAL ON SPECIAL” PROVISION

4.136 would remove the current “special on special” provisions whereby a student who remains unwell or is affected by a different (eligible) circumstance during the special assessment period or period of extension to submission deadline, cannot apply for further consideration of their circumstances. In this situation, unless the assessment is relatively minor and can be reweighted under 4.129(f), a student would be forced to accept a late withdrawal from the subject as their only real accommodation. The other options would require them to accept a mark that does not reflect their actual academic capacity. There are a number of critical problems with this approach.

Firstly, given the importance placed on academic integrity at this university, it is difficult to see how this proposed system will not damage the integrity of the assessment system. Students will inevitably receive grades which are not an accurate reflection of their learning and academic capacity. Not least, this flies in the face of even the most basic equity arrangements.

Further to this, students with more complex issues will not be accommodated by the proposed arrangements. If consideration were only at issue in straightforward acute situations, the impact of the proposal may be more contained, however increasing numbers of students face more complex issues, and combinations of acute and chronic circumstances which cannot be approached with such reductionism.

Finally, this proposal would have an undeniable economic impact on students forced to withdraw from subjects, which will disproportionately affect international students, as well as students with graduate employment arranged or other matters which will be impacted by delayed graduation.

*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 unlucky to have an emergency hospital admission the day before his exam (twice). The process was already hard enough!*

*(UMSU Special consideration survey September 2019)*

*This policy means that by sitting or submitting an exam or assessment, you are declaring that you are fit to do so, and forego your ability to request special consideration at a later date. If either of these instances had occurred under Fit to Sit, I would have to be marked on my paranoid scribbles or my illegible essay. Extenuating circumstances don't just disappear once you enter the exam room!*

*I live with schizoaffective disorder, of which hallucinations and delusions are a large part. I have penned an entirely nonsensical exam paper during a psychotic episode. I have submitted entire essays where, due to OCD, I removed every use of the letter “a”.*

*(UMSU Special consideration survey September 2019)*

*Extremely unfair to students whom need special consideration or those whom are sick in the case of exams and are unable to perform at their best capability due to a sudden illness. Additionally the “sit or fail” policy is sickening, pushing extra time to a student's degree for circumstance which are not in their control. This also increases student loans, wringing more money out of students that will have to repeat a subject, having a major effect on their mental health.*

*(UMSU Special consideration survey September 2019)*

### SPECIAL CONSIDERATION WILL NOT BE AVAILABLE FOR COMPLETED ASSESSMENT TASKS

By the introduction of 4.131, students must decide whether they are fit to sit examinations or submit their assessment. This approach is commonly referred to as “fit to sit/submit”<sup>1</sup> and is predicated on the idea that once a student elects to sit an exam or submit an assignment, they declare themselves fit for that task, and cannot later claim they were actually affected by extenuating circumstances.

### SPECIAL CONSIDERATION — ALWAYS GAMBLE RESPONSIBLY...

There are a number of inherent problems with the “fit to sit” approach. Firstly, regardless of how much information is provided to students about eligibility, it is impossible for a student to know that their circumstances will ultimately be accepted. UMSU Advocacy fields large volumes of enquiries from students who have applied for Special Consideration due to illness or extenuating circumstances which has not been accepted as sufficiently serious, or is regarded as something they should have anticipated. Under a “fit to sit” regime, these students would have missed their exam and ended up with a fail.

This is compounded by the reluctance of the University to provide too much guidance on qualifying circumstances lest students misuse this information to “game the system”. For evidence of this, you need only be a fly on the wall at any Special Consideration Practice Leader’s Group meeting where this has been discussed. These meetings are held regularly throughout the year for professional staff in the faculties who administer Special Consideration to discuss the process with the staff of Student Equity and Disability Services (SEDS). On more than one occasion discussion proposing students be provided with more detailed information on eligibility for Special Consideration has culminated in certain staff warning that providing more detail on eligibility will allow students to exploit this knowledge... somehow. At one Advocacy Service Reference Group meeting, a senior staff member even suggested that Advocacy Staff sometimes help students “find loopholes” in the Special Consideration process by explaining the eligibility criteria! Yet, given a student will always be required

*I know that if one of my grandparents were to pass away, I would be unfit to sit an assessment, but the new ‘fit to sit’ rule would create a great deal of uncertainty, and choosing whether or not to sit an exam and risk my application being rejected would be a huge strain on my mental health in what would already be an incredibly difficult time.*

*(UMSU Special consideration survey September 2019)*

<sup>1</sup> Hereafter “fit to sit”.

## THE UGLY — CHANGES WHICH UMSU OPPOSES (CONTINUED)

to obtain independently documented evidence to support an application, it is a totally specious proposition to claim that providing this information is in any way problematic. Surely best practice is transparent process.

This also speaks to the narrative that students are abusing the Special Consideration process on a large scale and that, undoubtedly, is a key reason for the proposed changes. UMSU notes that there is no evidence that supports this narrative. In June this year the Special Consideration Practice Leaders Group noted that audits of Special Consideration applications in Semester 2 2018 had disclosed only eight fraudulent applications of 152 “suspect” submissions checked (of several thousand applications submitted). Further, if the University has evidence that individual students have “gamed the system” then it has the means to pursue these students via the Student Conduct Policy. Again, there is no evidence of increased rates of student misconduct of this type which might support a narrative of widespread student bad faith in engaging with Special Consideration.

Consequently, UMSU is of the view that — however the University variously describes it — “strategic behaviours”, “gaming the system” or “safety net” applications are both extreme and uncommon events, and the University appears to have foregrounded these issues as a convenient alternative to addressing the real needs of students.

*... it is usually impossible to know exactly to what extent your special circumstance could affect your performance in an exam until you attempt to sit it in the first place. This is especially true with mental or psychological impairments such as anxiety, depression or bereavement that can strike hardest in higher pressure situations (such as a final exam).*

*(UMSU Special consideration survey September 2019)*

*Overall, I think these changes are a horrendous thing that would negatively impact me and pretty much the whole student base, and to be honest, they've had a really negative impact on my opinion of the university, who seems to be favouring convenience over the students under a guise of discipline (as if students trying to game a system is worse than making education inaccessible to anyone with chronic illness or suboptimal circumstances...).*

*(UMSU Special consideration survey September 2019)*

### STUDENTS' CAPACITY TO ASSESS THEIR OWN FITNESS

The integrity of any “fit to sit” approach is wholly contingent on the capacity of a student to assess their own fitness at the exact time when their judgement may be impaired by the very condition for which they may require Special Consideration.

UMSU does not have access to University data on how many late applications are ultimately accepted;<sup>2</sup> however, from the casework data of the UMSU Advocacy Service, it is clear there are numerous compelling cases where students did not and could not assess their own fitness at the time of assessment. Denying these students accommodation via an administrative policy provision potentially fetters appropriate equitable discretion.

Aside from the obvious effects on students with mental health difficulties, the requirement to make a judgement on one's own fitness is also seriously compromised where circumstances influencing a student's fitness occur immediately before an exam and they simply have insufficient time to fully consider the likely effect on their performance.

Moreover, it is highly likely that the application of the “fit to sit” approach will shift the consideration of students' extenuating circumstances from the Special Consideration process to Course Academic Progress Committees (CAPC). Students who fail subjects as a result of “fit to sit” will increasingly be required to attend a CAPC meeting to show cause as to why they should be allowed to continue their studies. Not only will this increase the workload of the academic and professional staff who administer and sit on these committees, it is evidence of an approach to student wellbeing that is entirely reactive and inconsistent with contemporary approaches to supporting students.

Consequently, the proposed changes also have the potential to increase rates of attrition for students for reasons that are not primarily related to their academic ability.

Finally, it is unclear whether any consideration has been given to the serious potential for exacerbation of students' existing conditions in the preparation of this proposal.

*So I sat my exam and later I saw a counsellor and they explained to me that I suffered from anxiety and the reason I didn't do well or couldn't study at all was because I had a mental health issue affecting me at the time.*

*(UMSU Special consideration survey September 2019)*

*One of the most insidiously nasty aspects [of this proposal] is that issues like mental disorders can affect your judgement of whether you'll need special consideration, as well as your ability to do the assessment.*

*(UMSU Special consideration survey September 2019)*

*These changes have the potential to exacerbate students' mental health issues by sending the message that they do not have the support that they need to study at this university whilst tackling a mental illness, as well as any other unforeseen circumstances that have the potential to affect how a student completes assessments.*

*(UMSU Special consideration survey September 2019)*

<sup>2</sup>Late applications being those submitted outside the current 4-day window to apply in a timely way.

**CHANGED TIMELINES FOR SUBMISSION OF SPECIAL CONSIDERATION APPLICATIONS**

Removing any extra time to obtain supporting documentation beyond the four-business day application window set out at 4.130 will administratively exclude a large number of students who have experienced eligible circumstances, but simply cannot obtain the required documentation in that time.

Many conditions cannot be adequately substantiated by a general practitioner. Students who see specialists, are waiting for test results, whose regular practitioner is away, and those who need to furnish translated documentation are among those who will be significantly impacted by this change.

Accordingly, UMSU recommends that not only is the custom and practice of allowing a further five days to submit documentation be maintained, but it should be codified into the policy.

*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)*

### DISPROPORTIONATE IMPACT ON ALREADY VULNERABLE STUDENTS

As the comments and commentary above set out, the students who stand to lose the most are those who are already facing significant barriers, and the very students for whom the system and the process of Special Consideration need to be designed.

The *National Tertiary Student Wellbeing Survey 2016* jointly undertaken by Headspace and the National Union of Students, found that tertiary students reported “high levels of psychological distress and symptoms of mental health problems” negatively affecting their studies. The report notes that “a substantial two-thirds (67.3%) of students rated their mental health as only fair or poor, which compared with a much lower 39.3% who negatively rated their physical health”<sup>3</sup>. More concerning still, the survey found “an alarming 35.4% of students reported thoughts of self-harm or suicide affected their studies”<sup>4</sup>. In this context, notwithstanding the University’s clear duty of care to its students, there is robust evidence that the proposed changes risk increasing levels of harm to a significant proportion of those students.

In making changes to Special Consideration the University needs to consider the impact that the application of that process will have on the students who need to access it. It is clear that the proposed changes to Special Consideration process are, in and of themselves, a cause of anxiety and concern for students. If students view the process that is intended to provide them with flexibility and support due to circumstances out of their control as hostile to their interests, this completely compromises Special Consideration’s capacity to fulfil its primary purpose.

*The proposed changes simply to not consider the nuanced and complicated situation students can be in and are particularly unfair to neuro-diverse students, students with ongoing mental health issues and students in difficult home situations where their situation can change unexpectedly and have large impacts on their performance.*

*(UMSU Special consideration survey September 2019)*

*I have had significant mental health challenges throughout my university experience. I have struggled with anxiety on and off, and was hospitalised for trying to commit suicide at the age of 18. Coming to unimelb at 19 I still had to deal with all the trauma that came with what I experienced at 18. Special consideration allowed me to continue studying, and allowed me complete my undergrad degree. Changing the “fit to sit” rules would have significantly impacted my ability to study. 1/4 people will have mental health issues, students who live out of home and are in financial hardship feel these effects more than any others. Changing these rules will do nothing to help University retention rates or student welfare. They serve to punish students experiencing difficulties rather than support them.*

*(UMSU Special consideration survey September 2019)*

*These changes, and the University of Melbourne’s entire treatment of students more generally, highlight a systemic distrust of student’s intentions, and perpetuates alienation and disenfranchisement in students, a demographic whom are amongst the highest in anxiety, depression and similarly disabling mental health disorders that are directly affected and will be exacerbated by these changes.*

*(UMSU Special consideration survey September 2019)*

<sup>3</sup> *National Tertiary Student Wellbeing Survey 2016* p 19.

<sup>4</sup> *Ibid.*

### HOW TO EVALUATE THE EFFICACY OF THE PROPOSED CHANGES WITHOUT AN EVIDENCE BASE

In UMSU's experience of public policy consultation, the establishment of clear rationales supported by evidence for the proposed changes must be a fundamental aspect of the methodology. A rationale allows the consultation process to test the efficacy of the proposed solution to the problems identified in the rationale, and allows evaluation of whether the changes reflect a bottom up approach which ensures the lowest impact changes — just those sufficient to resolve the identified problem — are employed.

Evidence-based policy making is hardly a novel concept, underpinning as it does most modern public policy approaches. The Chairman of the Productivity Commission until 2013, Gary Banks puts it like this:

*All policy effectively is experimentation. But that does not mean flying blind — we still need a good rationale or a good theory. Rationales and theories themselves can be subjected to scrutiny and debate, and in a sense that constitutes a form of evidence that can give some assurance about the likely outcomes. Importantly though, all policy experiments need to be monitored and evaluated and, over time, corrected or terminated if they turn out to be failures.<sup>5</sup>*

A good rationale or theory based on sound evidence is conspicuous by its absence in this proposed policy change. On the contrary, the changes discussed above appear to be grounded in hostile narratives and anecdote at best. The President of the Academic Board noted in his email circular to Board members that the proposed amendments to the current policy are “a response to feedback from academic divisions in the context of recent changes in the trend data on Special Consideration applications”. That is, feedback from members of the Academic Consultation and Coordination Committee, issues raised by staff informally with the Academic Secretary, and “trend data” which shows increasing applications for Special Consideration, but not the basis for this increase. The trend data (which has not been made available as part of the consultation), is unlikely to be data from

*I'd be super interested to see the 'evidence' backing up the uni's claim that students are abusing Special Consideration.*

*(UMSU Special consideration survey September 2019)*

<sup>5</sup> Gary banks, *Challenges of evidence-based policy-making* <<https://www.apsc.gov.au/challenges-evidence-based-policy-making>>.

which a student's motive can be extrapolated. Significantly, this "evidence" is all grounded upon staff perceptions. UMSU has reason to wonder, if feedback can be so powerful an influencer of policy change, why UMSU's feedback for over a decade with respect to urgently required policy and process changes to the current Special Consideration approach have fallen on such barren ground.

### A SOLUTION LOOKING FOR A PROBLEM

It should be unnecessary to point out at an esteemed research institution, that this process should start with the University establishing, via evidence and data, the actual problems that need to be solved. Any proposed changes to policy should be a response that connects the problem, the data and the solution. Consultation should be targeted at assessing the validity and effectiveness of this nexus. This necessarily means that the data on which the University relies also needs to be made available.

UMSU notes that its feedback in relation to Special Consideration has been provided to the University via multiple processes of review and through its Advocacy Service's quarterly reports since 2012. Significantly, these reports and submissions are grounded in the data generated by the Advocacy Service which establishes a longitudinal picture of students' experience of the Special Consideration process.

Accordingly, in the spirit of evidence-based argument, UMSU has obtained quantitative and qualitative feedback from students, prospective students and alumni about the proposed changes. This data from a large student sample is set out later in this submission.

The data derived from students – both through casework and from UMSU's recent survey – clearly establishes that there are urgent issues for the University to address, although not those identified in the current proposal. In this context it is both perplexing and concerning that the University has proposed changes to this current policy in the absence of its own rigorous base of evidence, and without reference to the significant body of evidence that has been provided by UMSU since 2012.

### WHEN MYTHS AND MISCONCEPTIONS TAKE THE PLACE OF EVIDENCE

Given the University has articulated a focus on its access programs and shown a general awareness of conditions which affect educational participation, including mental illness and neuro-diversity, the persistence of misconceived narratives is disquieting.

The value of fostering student resilience as a fundamental part of tertiary education has gained increasing emphasis in the last decade. Research and recommendations generally focus on the need for universities to begin to invest in student wellbeing to the same extent that they are willing to devote to campus improvement programs and capital works.<sup>6</sup> Conversely, in framing a particular view of students as needing to “build resilience” (or in the vernacular to “harden up”), some University narratives have deviated from this message, favouring a formulation which goes: they need to learn to cope, after all Special Consideration does not exist in the real-world. This conveniently obscures University inaction on student wellbeing behind a positive but illusory account — that in denying students accommodation for their circumstances, the University is somehow doing them a favour.

UMSU notes however, the University *is* part of the real world. The notion that the University exists in some discrete universe, separated from the banality of day to day reality, needs to be comprehensively challenged. The comments in our survey from students tells a very different story, of everyday people dealing with all the usual trials and tribulations common to humanity at large — the idea that we are in some different cosmos at University does not mirror their experience.

Paradoxically — in taking this approach — University staff are actually holding students to a higher standard than that to which they themselves are held. UMSU has long argued that the evidentiary thresholds for Special Consideration should be no more onerous than that which is required for staff personal leave or workplace adjustments subsequent to illness or injury at this University.

*Even if some students are abusing the Special Consideration policy (and I'm confident the numbers would be relatively small), I don't see the logic in creating barriers for students who genuinely need Special Consideration.*

*(UMSU Special consideration survey September 2019)*

<sup>6</sup> See e.g. Benjamin Veness 'The Wicked Problem of University Student Mental Health' (2016) *Report to the Winston Churchill Memorial Trust January 2016* [http://www.churchilltrust.com.au/media/fellows/Veness\\_B\\_2013\\_The\\_wicked\\_problem\\_of\\_university\\_student\\_mental\\_health.pdf](http://www.churchilltrust.com.au/media/fellows/Veness_B_2013_The_wicked_problem_of_university_student_mental_health.pdf), p 36.

Moreover, the narrative that the proposed approach to Special Consideration is actually good for students sits in direct opposition to the overwhelming view of students who support the notion that an effective Special Consideration process, grounded in the reality of students' experiences, is critical to student success.

Several years ago the University was actively participating in the *Enhancing Student Wellbeing Project*,<sup>7</sup> the central aim of which was “to build the capacity of academic educators to design curriculum and create teaching and learning environments that enhance student mental wellbeing”. Those driving these proposed policy changes would do well to revisit these resources. Notably Action Area 5 in the Framework for Promoting Student mental Wellbeing in Universities enjoins universities to “ensure access to effective services” and supports:

*Ensuring that students who may be experiencing mental health difficulties have access to appropriate services and academic adjustments requires not only that those services are in place but also that barriers to access (awareness and perception) are addressed.*<sup>8</sup>

The *Framework* also lists four Institutional Enablers, number one on that list is that “policies and actions are based on accurate and appropriate information about students' needs, interests, circumstances and health”.<sup>9</sup>

A full review of the ample literature on this subject, much of which has been undertaken by this University, is beyond the scope of this submission, however UMSU recommends that those championing this policy change take some time to familiarise themselves with contemporary thinking on this subject.<sup>10</sup>

*Special consideration is necessary for students with severe complications to passing their subjects and getting their degrees. While it is understandable that there are concerns of some students misappropriating special consideration, it is cruel and unjust to hold this over the University's most vulnerable students. I hope the University realises that we are here to learn and that their job is to facilitate that as much as possible and not to treat the students with the same suspicion as a thief. We do not pay thousands of dollars a year only to have our education disrupted by forces out of our control and then be forced to struggle through a bureaucracy that despises us. Melbourne University, please care about your students.*

*(UMSU Special consideration survey September 2019)*

<sup>7</sup> Enhancing Student Wellbeing <[unistudentwellbeing.edu.au](http://unistudentwellbeing.edu.au)>.

<sup>8</sup> *A Framework for Promoting Student Mental Wellbeing in Universities* p. 6 <[http://unistudentwellbeing.edu.au/wp-content/uploads/2016/11/MCSHE-Student-Wellbeing-Framework\\_FINAL.pdf](http://unistudentwellbeing.edu.au/wp-content/uploads/2016/11/MCSHE-Student-Wellbeing-Framework_FINAL.pdf)> emphasis added.

<sup>9</sup> *Ibid*, p.7.

<sup>10</sup> See e.g. Associate Professor Wendy Larcombe's work, including her *Report to TALDEC* on the 2013 Student Wellbeing Surveys; Chi Baik, Wendy Larcombe & Abi Brooker, 'How universities can enhance student mental wellbeing: the student perspective' (2019) 38(4) *Higher Education Research & Development* 674; see also Nigar Khawaja & Helen Stallman 'Understanding the coping strategies of international students : a qualitative approach' (2011) 21(2) *Australian Journal of Guidance and Counselling* 203; Margot Schofield, Paul O'Halloran, Siân A McLean, Christine Forrester-Knauss & Susan J Paxton 'Depressive Symptoms Among Australian University Students: Who Is at Risk?' (2016) 51(2) *Australian Psychologist* 135; Helen Stallman 'Prevalence of psychological distress in university students: Implications for service delivery' (2008) 37(8) *Australian Family Physician* 673 and many more.

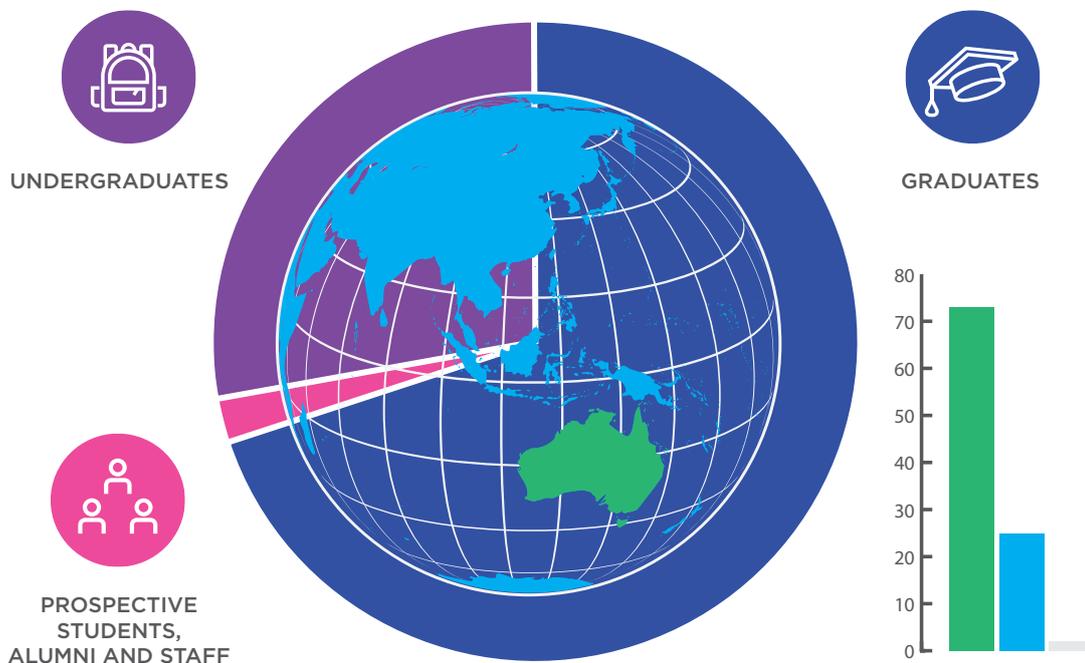
## OUTCOMES OF OUR SURVEY

When the proposed changes were first floated, UMSU asked students to complete a short survey to gauge reactions to the proposals.

**UMSU received 2108 responses in just under two weeks.**

We believe this represents significant and credible data on the matter, in contrast to the assertions and narratives upon which the policy changes appear to be predicated.

### IN TERMS OF THE DEMOGRAPHICS OF THE RESPONDENTS;



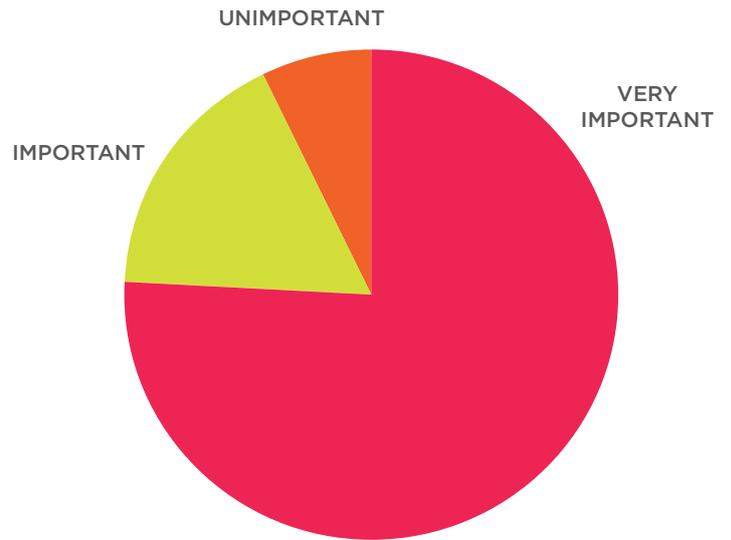
70% identified themselves as undergraduates, 28% as graduates, and the remainder were either alumni, prospective students or staff.

73% of respondents are domestic students, and 25% international, with 2% identifying as non-students currently.

**HOW IMPORTANT IS SPECIAL CONSIDERATION TO YOU?**

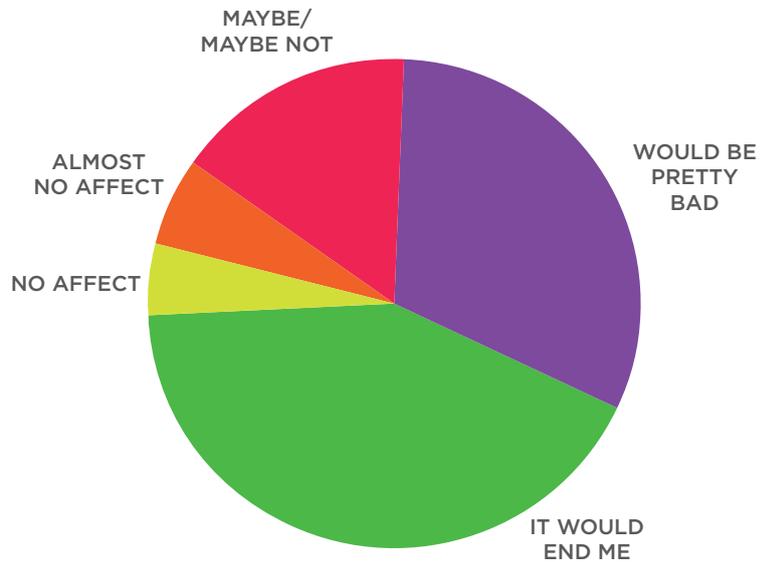
Generally, 92% of respondents indicated it was important, with three quarters indicating it is very important.

There was no difference between graduates and undergraduates — with a uniform 92% finding it important. 100% of respondents identifying as prospective students and staff indicated it was very important. Slightly more domestic than international students (93%-90%) found Special Consideration important.



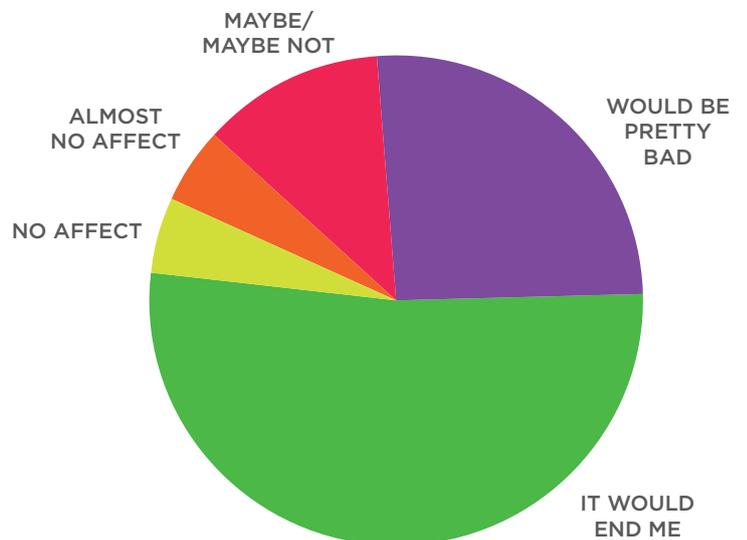
**HOW WOULD THE PROPOSED “FIT TO SIT” RULE AFFECT/POTENTIALLY AFFECT YOU?**

Respondents could choose from a scale of “not at all” to “it would end me” — with 73% of respondents indicating it would have a significant impact. Of undergraduates and graduates this was 74% and 72% respectively. More international students (76%) indicated a significant impact than domestic students (73%).



**HOW WOULD THE REMOVAL OF THE “SPECIAL ON SPECIAL” PROVISION AFFECT/POTENTIALLY AFFECT YOU?**

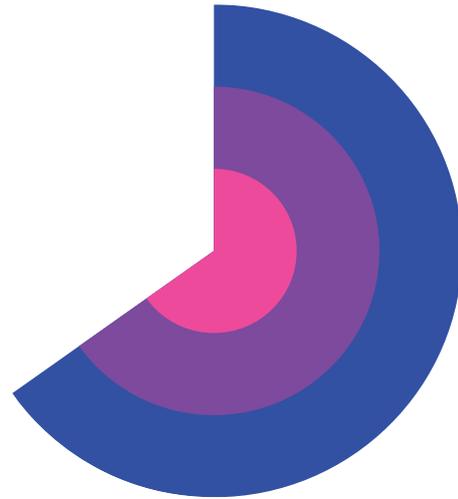
Three quarters of respondents indicated it would have a significant impact, with slightly more (77% of undergraduates than graduates (75%) indicating this impact and the same proportions of domestic students (77%) over international students (75%).



## OUTCOMES OF OUR SURVEY

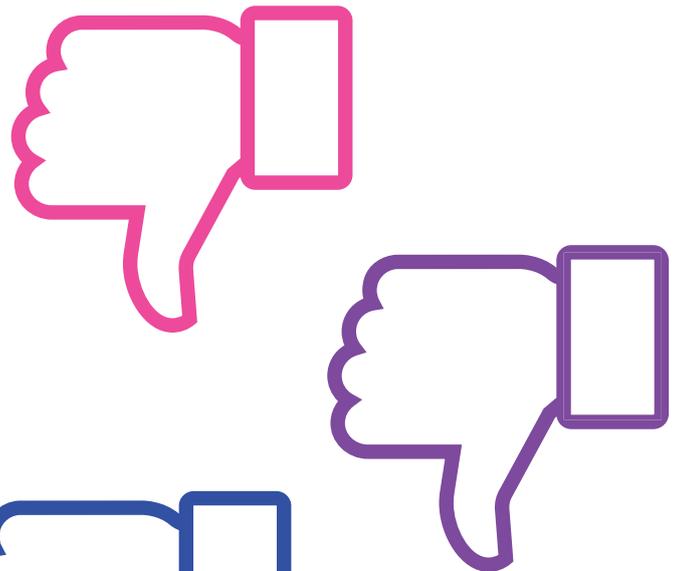
### HOW WOULD THE CHANGED TIMELINES FOR SUBMISSION OF SPECIAL CONSIDERATION APPLICATIONS AFFECT/POTENTIALLY AFFECT YOU?

Almost two thirds of respondents overall were concerned about this change and there was virtually no variation between cohorts on this issue.



### HOW FAIR DO YOU THINK THE PROPOSED CHANGES ARE?

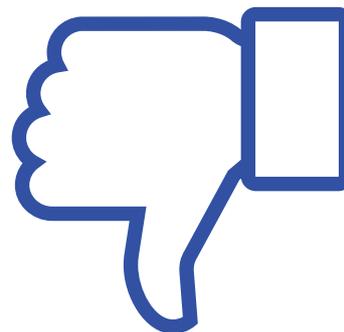
89% of all respondents said they thought the proposed changes to the above provisions would be unfair, with 7% saying they were fair and 2% did not care. Slightly more undergraduate students (91%) than graduates (88%) thought the proposals were unfair, and a more significant 92% of domestic students than 84% of international student respondents indicated they felt the changes would be unfair.



### HOW DO THESE PROPOSED CHANGES AFFECT YOUR EXPERIENCE OF UNIMELB?

Of all respondents, over half indicated the changes significantly affected their experience of the university, with 39% indicating it impacted somewhat on their experience and 7% were unaffected. Overall there was negligible difference between graduate and undergraduates and domestic and international respondents.

However, there were significantly more graduate international students indicating their experience would be significantly impacted (57%).



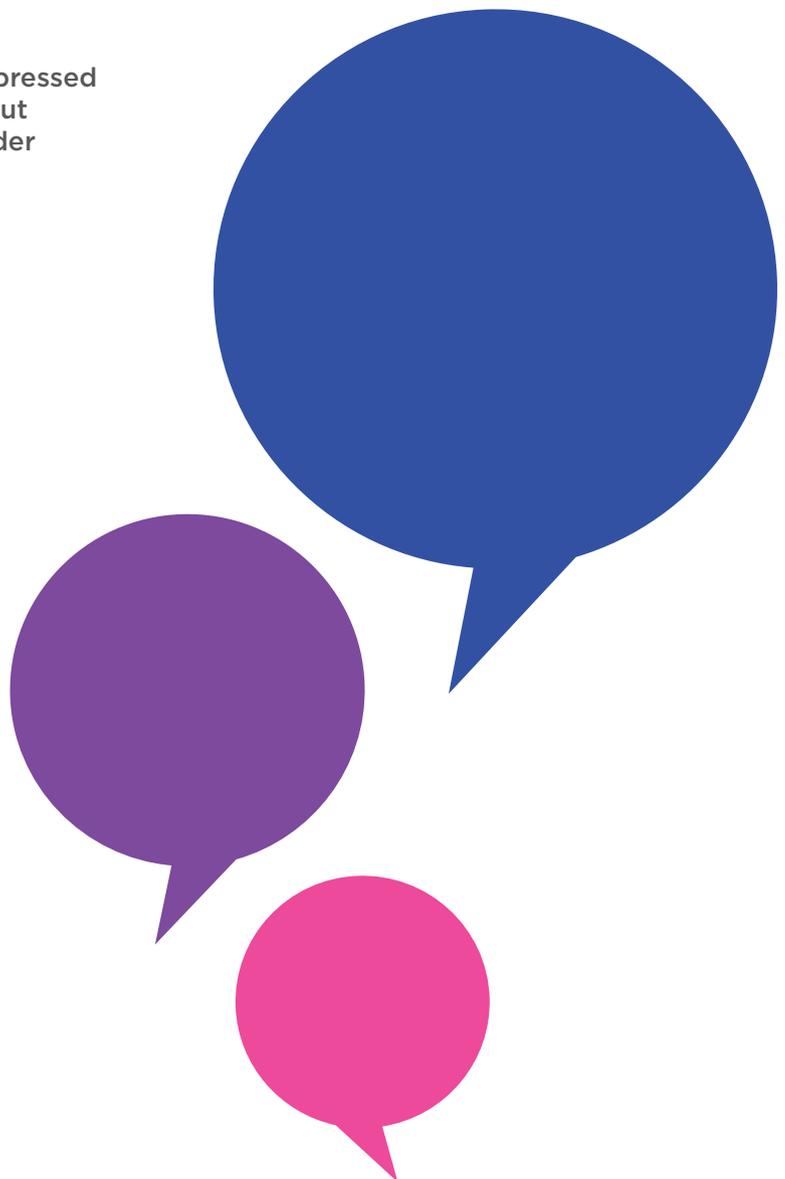
## OUTCOMES OF OUR SURVEY

### WOULD THIS PROPOSED CHANGE IMPACT YOUR DECISION TO STUDY AT MELBOURNE UNI IF THE CHANGES WERE MADE PRIOR TO YOUR ENROLMENT?

41% of all respondents indicated it would definitely influence a decision to study here if the changes were in place at the time of application to the university. A third thought it maybe a consideration, and a quarter did not think it would have changed anything.

To complement the quantitative data, almost 800 respondents also took the time to provide detailed comments. Of the sentiments presented in the qualitative feedback, 85% was overwhelmingly negative, 12% was predominantly negative and only 3% of comments contained positive sentiment about the changes.

Of the partly positive sentiment, some expressed understanding of the motive for change but nevertheless indicated they did not consider it a positive move.



## OUTCOMES OF OUR SURVEY

*I can understand why these changes are being considered, however I strongly believe it significantly narrows the type of circumstances that can receive special considerations which will further alienate students.*

*(UMSU Special consideration survey September 2019)*

**The relevance of Blackstone's ratio was highlighted by another respondent who accepted the view that there are some who may exploit the current system, but they should not be the dominant focus of equity measures.<sup>11</sup>**

*I know the Uni has serious problems with people abusing the system but it's better to let 100 people cheat the system than to potentially give someone with serious mental issues a reason to potentially harm themselves over an exam.*

*(UMSU Special consideration survey September 2019)*

**Some students who did not have an issue with the fit to sit proposal, nevertheless took exception to the removal of "specials on specials".**

*Overall, I do think the fit-to-sit rule is fair, however the change where supplementary assessments won't be given and you will be withdrawn without fail is a bit ridiculous as imagine doing well all semester and then something drastic happens last minute and you need to apply for special considerations for the exam, a whole semesters work is gone out of the window because of one day.*

*(UMSU Special consideration survey September 2019)*

**A number of respondents pointed out that the current system is already problematic, even without the proposed changes.**

*With the diagnosis of terminal illness in my nuclear family I have been appalled at the accessibility of special consideration and have ultimately given up on the process due to the lack of clear instructions, assistance when trying to gain clarity and overall no concern for individual circumstances.*

*(UMSU Special consideration survey September 2019)*

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<sup>11</sup> It is more important that innocence should be protected, than it is, that guilt be punished. Or put another way: "it is better to let the crime of a guilty person go unpunished than to condemn the innocent." (doctrine ascribed in 1769 by Sir William Blackstone).

## OUTCOMES OF OUR SURVEY

### PROMULGATION OF THE CHANGES

Historically this University has urged students to attempt an exam at all costs. This remains the advice on all student facing information. A “fit to sit” policy runs utterly counter to this culture, and many students regardless of their fitness may be unaware, or too fearful of the risk to consider not sitting or submitting assessment. In this context, we would expect the University would need to invest significant and ongoing resources to satisfactorily evidence that its students have understood the new policy before being able to enforce it.

Moreover, changing a long-standing policy for students who are partway through their course, and who are used to a particular framework, is incredibly confusing. An example of this is the problems faced at the University of NSW where a similar change to the assessment regime was enacted in March this year. We are advised that the University has elected to grandparent the old system in some cases, and has not been able to properly enforce the new policy since it was introduced in March this year, creating even more uncertainty among students and advocates.

### CONCLUSION

UMSU does not share the University’s view that students are self-interested gamers of the system. We do acknowledge the significant resources required to appropriately address equity matters using best practice principles. Accordingly neither does UMSU take the view that academic and professional staff should unduly bear overwhelming administrative burdens. On the contrary, we believe the best value will be delivered when staff have full capacity to deal patiently and sensitively with students, making sound and fair decisions. For a University whose Vice Chancellor has recently stated aspirations to become a “top-flight world university”,<sup>12</sup> showing leadership with exemplary equity practices is the least we might expect.

*I think it's easy (for the Uni leadership) to forget that universities are service providers and that their students are the customers and should be treated as such (this simply reaffirms there arrogance and mistrustful mindset) and realise that we pay to be here because we believed that we were going to be provided with a quality experience.*

*(UMSU Special consideration survey September 2019)*

<sup>12</sup> Strategy 2030 Discussion paper <<https://staff.unimelb.edu.au/strategy-planning/strategy-2030>>.

## CHANGES WE WOULD LIKE TO SEE

UMSU has been consistently calling for changes to Special Consideration for more than a decade. This has been documented via the quarterly reports of our Advocacy Service and in submissions to various University reviews. Rather than replicate these arguments the relevant sections of UMSU's response to the *Melbourne Student Experience Enhancement Project Green Paper* are appended to this submission. UMSU reiterates that these arguments are based in a body of evidence collected over several years and that highlights the actual issues to be addressed.

The primary change required is a transformation of University culture and the way in which it views students. The proposed changes to Special Consideration rest significantly on a narrative that says that students are not to be trusted; that students who are asking for help should be viewed with suspicion. Whether students are engaging in “strategic behaviours” or “gaming the system” this narrative persists in the absence of any supporting evidence because it has become an ingrained component of University culture. Moreover, UMSU believes that wellbeing strategies must be embedded in teaching and learning practices and argue that implementing the framework recommended by the University's own Centre for the Study of Higher Education would be a great place to start.

Until the University can demonstrate it has implemented and evaluated these strategies to improve student wellbeing, efforts to constrain access to appropriate academic adjustments appear very cynical.

To be effective, the University's approach to providing support to students needs to be grounded in good faith, and a lived commitment to student wellbeing and success.

In addition to our concerns with the proposed changes which we have set out above — UMSU would like to see the following changes introduced to improve the existing policy:

*It's already terrible, I was in an incredibly vulnerable place and it was the worst slap in the face to have to fight to prove how unwell I was AFTER I had already submitted a legitimate HPR that detailed my mental health struggles.*

*(UMSU Special consideration survey September 2019)*

## CHANGES WE WOULD LIKE TO SEE

### RECOMMENDED POLICY CHANGES

#### RECOMMENDATION ONE

**Implement the proposed changes which UMSU supports.**

- *Allowing sanctioned faculty academic commitments to be recognised for alternative examination/assessment arrangement; e.g. student presenting at an academic/ research conference (4.117(c)).*
- *Clarification on roles and responsibilities in determining eligibility and outcome (4.128-4.129 & 4.140-4.141).*
- *Clarification of the short term and ongoing alternative assessment provisions (4.129 & 4.142).*
- *Documentation requirements detailed (4.130 [sic] 4.123?) and the requirement for medical documents to cover specified assessment dates (1.426).*

#### RECOMMENDATION TWO

**Do not implement the proposed changes which UMSU opposes.**

- *Reject the removal of the “special on special” provision (4.136).  
This remains an important opportunity allowing students a further chance to pass a subject when they remain affected or experience a further extenuating circumstance during the reassessment period or period of their original extension.*
- *Reject the adoption of a “fit to sit/submit” provision (4.131).  
This is a fundamentally inequitable and misconceived proposal which will disproportionately affect the most vulnerable students.*
- *Reject any changes which shorten the timeline available to apply for Special Consideration and/or to submit supporting documentation.  
Many conditions cannot be adequately substantiated by a general practitioner. Students who see specialists, are waiting for test results, whose regular practitioner is away, and those who need to furnish translated documentation are among those who will be significantly impacted by this change.*

#### RECOMMENDATION THREE

**Make explicit the method by which the duration of extensions must be calculated.**

Extensions should be applied such that the extension commences from the *end* date of incapacity set out in the documentation and runs for the period of the incapacity. Currently extensions are often applied to cover the duration of the incapacity alone, rather than extending the time to complete work by the period the student was unfit.

#### RECOMMENDATION FOUR

**Make explicit the deadlines and dates which are frequently invoked to disallow requests.**

For example, the “hard deadline” for Alternative Exam Arrangements (AEAs) needs to be made clear in policy and listed on the “key dates” section of the Uni Website and the Dates and Times section of subjects in the Handbook.

#### RECOMMENDATION FIVE

**Make explicit the extra period of time provided to obtain and provide supporting documentation.**

The current policy does not reference extra time for students to obtain and provide documentation in support of their Special Consideration application. A minimum of five days should be allowed in the policy.

## CHANGES WE WOULD LIKE TO SEE

### RECOMMENDED PROCESS CHANGES

In line with our previously stated recommendations, set out in the UMSU Response to the *Melbourne Student Experience Enhancement Project Green Paper* excerpted below, we continue to urge the University to take action on these chronic process concerns.

#### RECOMMENDATION ONE

**The University should invest significant resources in the support of student wellbeing and commit to a proper case managed approach to vulnerable complex needs students.**

While the overall demand for processing of Special Consideration applications is being met, the quality of the responses to some applicants is often less than adequate. This is especially evident in the processing of serious disadvantage and complex cases. This approach can have serious material and health consequences on already vulnerable students. For these reasons we believe that the University needs to address this deficit in its approach to students with serious disabilities by adopting a proper case management approach to these applicants, committing sufficient ongoing staff resources, training and evaluation to this end.

#### RECOMMENDATION TWO

**The University should provide sufficient resourcing to enable sound administrative decision making.**

A significant volume of complaints regarding the administration of Special Consideration are a result of poor administrative decisions. Decisions are often unduly fettered by rigid, black letter adherence to policy, where compassion and discretion is warranted.

The current system with SEDS as a single access point with too few staff to manage the volume of transactions is woefully insufficient. Similarly, since the Business Improvement program restructured faculty administration, professional staff in Academic Divisions experience extreme workload pressure as the volume of Special Consideration applications and academic adjustment plans increase with student awareness of the support available. This has resulted in the reduction of complex discretionary decision making to formulaic, rigid rule-based approaches which have no regard to evidence or specific circumstances, let alone the University's duty of care. This approach both fails students, and delivers poor outcomes for the University at large; shifting the burden to the central complaints and appeals processes (which are also poorly resourced).

Strengthening administrative decision-making processes to ensure the proper exercise of discretion thereby taking a more compassionate and less simplistic approach to the assessment of special consideration will go a long way to alleviating the distress and exacerbation of circumstances experienced by many students and their families.

#### RECOMMENDATION THREE

**The University should take a properly student-centred approach to Special Consideration end-to-end and bring its processes into proper compliance with the Disability Standards for Education.**

The application process for Special Consideration is opaque from the start, categorised by a lack of transparency in how and why decisions are made, and with some applications bounced between processes on technical grounds until unpublished deadlines have passed and applications can no longer be considered.

The University should commit to enhanced consultation with students about academic adjustments to reach a mutually beneficial outcome where the adjustments are reasonable and meet the particular needs of the student.

### RECOMMENDATION FOUR

**Improved education for academic staff regarding how to balance the competing priorities of equitable adjustments and inherent academic requirements.**

In some academic divisions there remain fundamental misapprehensions regarding the meaning of equity, the University's obligations under the Disability Standards for Education, and its duty of care to its students. This results in push back on eligibility decisions, foot dragging on outcomes, and an impoverished educational experience for the student.

Greater awareness and familiarity with equity principles and disability discrimination legislative obligations among academic staff will go some way to alleviating the burden on students to advocate for academic adjustments when the student is already unwell.

### EXCERPT FROM UMSU'S RESPONSE TO THE MELBOURNE STUDENT EXPERIENCE ENHANCEMENT PROJECT GREEN PAPER APRIL 2019

#### SERVICE DELIVERY AND APPLICATION OF POLICY AND PROCEDURE

UMSU has made regular and often repeated representations regarding actions required to address various aspects of University service delivery which impact student experience. This includes:

The Advocacy Service's Quarterly Reports

- UMSU submissions, written and verbal, to University processes including:
  - The Phillips KPA Review of Student Services (2011)
  - The Student Lifecycle Review (2013)
  - The Business Improvement Project (2014)
- Participation in a variety of University working groups in relation to the content and application of University policy and procedure.

The Student Union Advocacy Service commenced operation as the "single advocacy service" on May 1, 2012. Since that time, the Advocacy Service has produced a Quarterly Report documenting the sorts of problems students routinely face with the University's support services.

Since that first quarter of 2012 Special Consideration and student support related matters, and assessment disputes have consistently comprised around 40% of all casework presentations.

#### UNIVERSITY'S CULTURE AS A BARRIER TO EFFECTIVE SUPPORT

The Quarterly Reports also document a persistent pre-occupation among University staff that the incidence of students practicing "strategic behaviours" to gain unfair advantages in their studies has escalated. This culture of distrust and moral panic forms a backdrop across the seven years of these reports, although there is neither research that provides evidence to support this approach, nor anecdotal evidence of this type. This is another example of a disjunction between actual student experience and the University's approach, and one which we believe would be improved by active engagement with students as constituents.

In this context, successive Quarterly Reports observe that frequently students (and their families) experience the implementation of the special consideration system as punitive and lacking in compassion. It appears that one reason for this is a degree of compassion fatigue among staff as a result of the under resourcing of areas dealing with students experiencing equity and disability related issues.

## REACTIVE RATHER THAN PRO-ACTIVE APPROACH TO MENTAL HEALTH ISSUES

In the middle of 2014, the Advocacy Service began highlighting the over representation of students suffering mental health problems in Course Unsatisfactory Progress (as it then was) processes, noting that a large number of university students fall into in the age group featuring the highest proportion of those who suffer mental illness.<sup>1</sup> The Advocacy Service noted that it frequently sees students who have been struggling to keep up with their studies due to problems with their mental health and those students can be particularly vulnerable to the gap between the special consideration process and those mechanisms to support students with chronic disabilities or ongoing health problems. This is due to both the episodic nature of acute illness as well as this effect such illnesses can have on the organisation and motivation required to negotiate the current special consideration regime. In 2019 the Service continues to see the same or greater volume of these mental health related issues as it had five years previously.

## ADEQUATE RESOURCES FOR SOUND ADMINISTRATIVE DECISION MAKING

The identification of a policy gap between Special Consideration Procedures and support for chronic conditions eventually lead to the establishment of a working group to address the concerns. Specifically, UMSU advocated for a process whereby the university would accept applications for ‘adjustment’ generally and then determine the relevant procedure to apply – rather than requiring students to determine which procedure is appropriate to their application.

One of the issues UMSU has most frequently raised with University student support has been its lack of capacity to deal with complex matters. We have consistently highlighted examples of complex cases where the original decision makers fetter their discretion by rigid adherence to special consideration policy. We note that policies should be ‘sufficiently flexible to allow individual cases to be considered on their own merits’,<sup>2</sup> and that these sorts of poor decision-making practices have a detrimental impact on both the integrity of assessment, and the student experience, and seem to run counter to the University’s support objectives.

## INCREASED SUPPORT FOR VULNERABLE STUDENTS WITH COMPLEX NEEDS

Throughout 2015 to date, we have regularly raised serious problems with the lack of case management available to students with complex needs. We have noted consistently that the sort of decision making in this area must be both nuanced and responsive to the student’s reality, balancing regard for academic integrity with compassion to make logical determinations based on all of the circumstances. We noted in 2015 that the Student Lifecycle Review of 2013 identified Special Consideration as a significant “pain point” for students and recommended that the University take action to address in both the operation of the process and the way in which it has been conceived. Since 2013 Special Consideration policy and procedure has been subject to almost constant review and change; however, for many students the issues that gave rise to the 2013 recommendations remain or have become worse. At one point we referred to the Kafkaesque quality of the experience for many students, their families and their health care practitioners; and by this we meant the process remains both opaque and characterised by an extreme asymmetry of information and power.

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<sup>1</sup> That is – between 16 and 25 years old. *The Mentally Ill Students’ Guide for Academics* <<https://www.unimelb.edu.au/accessibility/guides/mental-illness>>

<sup>2</sup> Mark Aronson, Bruce Dyer and Matthew Groves, *Judicial Review of Administrative Action* (4th Ed, 2009) at p. 311.

Quarterly Reports have made recommendations regarding case management of students with complex needs dozens of times since then. Repeatedly noting that the University needs to ensure there are sufficient resources to enable sensitive and appropriate decision making with respect to special consideration specifically, and student support more broadly. Additionally, we have consistently recommended a review of the assumptions underpinning the approach to these students, and particularly, aside from proper case management, that, in the absence of evidence that students are actively attempting to abuse the process to obtain an unfair advantage, the process should be based on a good faith relationship with students. There seems to be a double standard, when it comes to accepting documentary evidence from students compared to the process for staff sick leave, where presumably health practitioner statements are accepted in good faith. This unequal approach might also be addressed by regarding students as constituents of the University.

Ultimately, despite some promising early discussions and plans discussed by the Special Consideration Working Group in 2012-2013, six years later, we are no closer to a properly resourced, case-managed process for very sick and vulnerable students.

Additionally, students with complex needs have negligible support in a range of important areas which are generally outside of the Advocacy Service's charter. This extends from simple administrative queries, requests for help filling out special consideration applications or enrolment and course related forms; and extends to very complex matters involving advocacy-related issues interwoven with more general support needs.

We believe that many of these issues were previously accommodated by local staff in Student Centres who were able to provide this level of direct assistance. Many tertiary advocacy services include a welfare component which offers well-being services and support to students in addition to advocacy functions. The UMSU Advocacy Service has structured its service model having regard to the supports for students purportedly offered by the University. We have consciously sought to avoid duplication of existing services for students and focussed our charter on providing independent, expert advocacy on academic and administrative matters. Accordingly, the Service does not offer counselling or general emotional/psychological support. The Service is also unable to access student records, the SAS or other university administrative tools, and does not provide any form of course advising.

Students report that they approach the Advocacy Service with matters outside our ambit for a range of reasons, including a greater awareness and profile of the Advocacy Service's support compared to University support options, the relative ease with which students can make direct contact with the Service via phone or drop in without lengthy waits; the change from the smaller local student centres, and shift from the comprehensive disability support at the erstwhile Disability Liaison Unit to the stripped down support offered under the centralised Stop 1 service model.

It is simply not enough to provide a single access point with too few staff to manage the volume of transactions. The result has been to reduce complex discretionary decision making to formulaic, rigid rule-based approaches which have no regard to evidence or specific circumstances, let alone the University's duty of care. Over the last decade or more, this has effectively shifted the burden to the Advocacy Service, and in turn, put greater than necessary pressure on the central complaints process and ultimately the Academic Board Appeal process. It is a matter of human rights that students with disabilities are provided with reasonable adjustments and accommodation of their circumstances.

UMSU does not advocate for a return to localised student centres; however, there is a clear need to ensure that the University provides a comprehensive range of properly resourced support services to students that supports their enrolments.

## AND A FINAL PROVOCATION:

*I heavily question the motives behind the University of Melbourne's proposed changes to Special Consideration, especially considering the likely increasing proportions of students across all faculties of the university that will be affected.*

*Given the already significant and at times seriously debilitating or potentially life-threatening impacts of the stigma against mental health/illness (Blue, B. (2015). Beyond Blue information paper: Stigma and discrimination associated with depression and anxiety.) (Bharadwaj, P., Pai, M. M., & Suziedelyte, A. (2017). Mental health stigma. Economics Letters, 159, 57-60.) (Nicola J. Reavley (Research Fellow) & Anthony F. Jorm (Professorial Fellow) (2011) Recognition of mental disorders and beliefs about treatment and outcome: findings from an Australian National Survey of Mental Health Literacy and Stigma, Australian and New Zealand Journal of Psychiatry, 45:11, 947-956, DOI: 10.3109/00048674.2011.621060) that is disproportionately intensified in the LGBTI+ community (Beyondblue position statement Depression and anxiety in gay, lesbian, bisexual, trans 1 and intersex populations (2012)), the University of Melbourne's proposed changes are likely to disproportionately impact and potentially discriminate against students struggling with mental health issues.*

*The proposed changes fly in the face of what approaches an educational institution should be taking to tackle the issues of student well-being in the 21st century. They are extremely disappointing and suggest an executive Board and team that is very out of touch with what students are looking for in universities when they enrol. I would seriously consider withdrawing my enrolment from Unimelb and seeking education elsewhere should the proposed changes be implemented. In addition, as a member of the Melbourne Law School community, I would actively seek and heavily consider any reasonable avenues, by legal challenge or otherwise, to protest and oppose the proposed changes to the Special Consideration policy. The Special Consideration process already needs reworking to more effectively accommodate the modern student, and these proposed changes are regressive rather than progressive. The undisclosed objectives behind the changes seem to be ease of administration and cost-cutting with a heavy cost to Unimelb's student base, physically and psychologically.*

*This further supports the current criticism aimed against Unimelb for sacrificing its consumer base (effectively) to pursue commercial and financial gain. This should not be the way a public educational institution operates. In the alternative, if this moral and ethical statement is not true or is insignificant to the financial stability of a public educational institution, it is my belief and worth mentioning that the proposed Special Consideration changes is a classic example of being out of touch with its customer base and not understanding the customer jobs to be done, a leading source and contributor to business and commercial institutional failure (Christensen, C. M., Hall, T., Dillon, K., & Duncan, D. S. (2016). Know your customers' jobs to be done. Harvard Business Review, 94(9), 54-62.)*

*In conclusion, I would strongly suggest that the University of Melbourne reconsider their position regarding the proposed changes to the Special Consideration Policy, at the very least in the interests of maintaining its viability as an educational institution.*

(UMSU Special consideration survey September 2019)

