

Assessment and Assessment Flexibility Policy Suite Feedback

Introduction

Thank you for the opportunity to provide feedback on the draft Assessment and Assessment Flexibility Policy suite. RUSU notes that it has already provided detailed feedback into the assessment review process on 15th October 2024, as well as feedback on the draft policy principles on 28th February 2025 and on proposed changes to special consideration through Education Committee and on special consideration and invigilated exams via email on 23rd June 2025.

This submission will be split into three main sections. The first will cover the goals and purpose of the policy suite including the opportunities presented by review and the potential to make significant changes to the policy suite to support the strategic values of RMIT as detailed in Horizon 2 of Knowledge With Action, the Education Plan that supports that strategy and other associated strategic action plans across the university.

The second section will cover critical ideas contained in our original submission which we feel are essential to ensure that students at RMIT are provided with an opportunity to participate fairly and equitably in their learning and assessment.

The final section will list changes to the proposed redrafted policy suite that RUSU feels compromises student rights by methods including but not limited to, reducing access to adjustments to assessment, removing the ability of academics to exercise academic judgement and flexible decision making, failing to provide details on how students information will be collected, used, stored and destroyed in online invigilated exam scenarios and limiting the obligations of the university to meet its legal requirements with regards to students with a disability. This section will also flag clauses with text that appears contradictory or that did not provide sufficient detail to clarify processes. This will be presented as a list of clauses with RUSU's comments and feedback for each clause.

Assessment Policy Suite Review Feedback

Whilst RUSU acknowledges that significant work has been undertaken to restructure the Assessment and Assessment Flexibility policy and underlying procedures to better align the policy suite with the Policy Governance Policy requirements and aside from proposed changes to special consideration, the redrafted policy suite is underwhelming in its ambitions and goals.

Alignment with strategic plan

As Horizon 2 of Knowledge with Action is finalised and the supporting Education Plan is developed there is opportunity to enshrine some of the more aspirational assessment practices in policy. In Q3 2024 the Education Plan summary stated that research had identified key areas for improvement in student support including, "stronger monitoring and feedback loops are required for 'at risk' students referred to study support". Drafts for the 2026-2028 Education Plan

also allude to a need for initiatives that support lifelong learners and deliver high quality, connected and inclusive learning, experiences and support, characterised by personalisation, flexibility and inclusivity. There are untold opportunities to embed into policy bold new ideas and innovations in assessment, adjustments to assessment and academic progress that would realise these goals, but none have been taken.

Alignment with IDEA Framework

Similarly, barely any of the commitments to equitable access and participation through inclusion by design that have formed the foundation of RMIT's Inclusion, Diversity, Equity and Accessibility (IDEA) framework, are visible in this draft policy suite. The aspirations of this strategic framework are sector leading but require a whole of organisation implementation. Policy has the potential to be a key driver of strategic change through both academic and professional staff groups as well as with the student population.

Inclusion by design principles apply not just to assessment design but to the processes and procedures outlined in this policy suite. The Assessment and Assessment Flexibility Policy Suite review is an opportunity to implement inclusive processes that allow all students, but particularly marginalised students, accessible, flexible supportive learning and assessment and this includes the way they apply for and are granted assessment adjustments, including special consideration, the way that they are processed through academic progress processes, the way that they access their rights to appeal decisions made by the university.

Despite the introduction of the IDEA framework, the current draft policy suite has further limited access to special consideration by reducing the timeframe in which students can make a valid application, reduced the number of days a student with an Equitable Learning Plan (ELP) can apply for an extension request to 14 (despite a recent email communication from the Equitable Learning Service to students with an ELP stating they can request up to 21 days), and making changes to provisions around late special consideration applications. All of these changes reduce access to support in a way which is likely to have the most significant impacts on already marginalised students, the target cohorts that the IDEA framework is committing university to support by ensuring inclusion is designed into processes. For processes relating to assessment, academic progress and assessment adjustments, this needs to happen at the level of policy and procedure.

Opportunities for balancing workloads

There has been much discussion of the impact of some parts of the policy suite on the workload of academic and professional staff at RMIT, but RUSU sees very little evidence that academic and administrative workflow through the processes in the policy suite has been given sufficient consideration as part of this review. Changes have been made to special consideration to shorten timelines which will most likely result in an increased number of dismissed applications and late applications, both of which come at the expense of student access to assessment adjustments, but this redrafting does not appear to be underpinned by a full consideration of the way student requests around assessment flow through the organisation, opportunities to reduce duplications of workload and to make process improvements that benefit staff and students.

Critical Changes to the Policy Suite and its Implementation at RMIT

In our initial submission, RUSU made several recommendations for changes to the policy suite. There are eight critical changes which RUSU believes need to be included in the redrafted policy suite to ensure students receive fair and equitable access to assessment, adjustments to assessment and processes that support academic progress.

Return to good standing and a strengthened APIP process

The first stage at risk process is intended to provide early academic support, but many students see it as a step toward exclusion. Once classified, the 'first stage at risk' status remains for the duration of a degree, regardless of subsequent academic progress. This creates significant and prolonged stress, compounding existing mental health challenges, an issue already affecting a high proportion of young Australians and disproportionately impacting university students.

Student feedback during RUSU's 2023 *Have Your Say Week* highlighted the anxiety caused by this system. In response, RUSU has advocated for the process to be re-imagined to genuinely support skill development, recognise later achievement, and remove the lasting burden of the first stage at risk label.

RUSU proposes a stronger, largely online Academic Performance Improvement Plan (APIP), combining self-guided surveys, compulsory learning modules, and optional referrals, with staff intervention where needed. This would both build essential academic skills and improve documentation for eCoEs.

RUSU also recommends introducing a pathway back to 'good standing' for students who demonstrate ongoing academic improvement after being placed first stage at risk. This would reset their status so that future difficulties return them to first stage at risk, not final stage. Participation in APIP modules would be required to regain good standing.

Such mechanisms are already standard across leading Australian universities and would give students the chance to recover, reduce mental health impacts, and remove unnecessary barriers to success. This proposal has received the support of the Vice Chancellor in meetings with RUSU and we believe it is a critical improvement to the Assessment and Assessment Flexibility Policy Suite.

Strengthening access to appeals and alternative resolution processes

RUSU has noted an increase in the number of appeals under this policy suite being pre-screened and as a result a dramatic decrease in the number of hearings students are awarded. The pre-screening process relies heavily on a contractually based set of template responses, prioritising administrative considerations over the university's values and the use of academic judgement.

Slow processing times for appeals can lead to students having multiple cases stacked on top of each other, a lengthy and unresolved appeal, (without a hearing), can create a separate academic progress process, which is then retracted when the original appeal is resolved. This erodes trust between students and the university and can lead students to feel they are being unnecessarily targeted or unfairly treated.

By rejecting appeals without hearings, the university risks missing patterns of poor decisions, flawed assessments, or systemic issues, removing a key quality control mechanism. RUSU proposes expanding the policy suite to include informal adjudication at school level for assessment appeals, show cause submissions, and special consideration decisions. Every student should be able to submit a written case and, if requested, attend a hearing focused on consultation and problem-solving rather than discipline, with academics involved in co-creating fair and compliant solutions.

This approach requires shared agreement among decision-makers about the policy's purpose, priorities, and values. It would reduce the number of cases escalating to UAC and ensure that those that are escalated are of good quality.

Finally, this approach naturally builds in the principles of inclusion by design. It creates benefits including ensuring disclosure pathways are safe and supportive for students with serious issues. Processes designed with consultation and inclusion at their centre, will ensure that all student cases are managed compassionately and appropriately, regardless of complexity. Students will have confidence that decisions will be guided by fairness and equity, even if outcomes are not always what they hoped for.

Special Consideration

RUSU does not support the proposed changes to special consideration. The reduction in timeframe to both apply for and finalise documentation in support of a special consideration application will disproportionately impact students impacted by complex circumstances, vulnerable students, and those registered with RMIT support services which frequently have wait times for appointments that often far exceed current timelines for applying for special consideration and submitting supporting documentation.

Special consideration is a form of support that students can access if they experience compassionate and compelling circumstances that impact their study. Their circumstances do not become less deserving of an adjustment to assessment if they take longer than three working days to apply or to submit evidence. If the university is concerned about the impact of high volumes of special consideration applications, they should consider methods for reducing application volume without restricting access to students. RUSU suggests implementing, as an alternative, automatic three-day extensions for eligible assessment tasks, as La Trobe University, the University of Newcastle and University of Technology Sydney have done.

RUSU also recommends the University adopt proactive special consideration, as outlined in the Support for Students Policy Guidelines Consultation Paper. Students facing significant distressing events would apply with minimal evidence and have applications automatically approved, without needing further documentation from external organisations. This approach could also be extended during periods of widespread hardship, such as geopolitical conflict or the referendum for First Nations students, where applications would be approved without additional investigation.

Finally RUSU recommends that the university accept statutory declarations in support of special consideration applications. RUSU advocates regularly support students navigating lengthy special consideration processes, often involving repeated communication to adjust their evidence to meet requirements. These delays could be reduced through clearer guidance on evidence—especially regarding relevant dates—and by accepting a broader range of documentation, such as statutory declarations.

Safe disclosures

Many students affected by gender-based violence (GBV) require academic flexibility and support. Often their first disclosure to the university occurs through special consideration or academic progress processes, which are not trauma-informed and can be complex, disclosure-driven, and re-traumatising. How the University responds to these early requests strongly influences whether students feel safe to make fuller disclosures. RMIT should review and monitor these initial processes to ensure they are supportive, survivor-focused, and enable a safe pathway to further disclosure and assistance, folding any recommendations from the review process into the re-drafted policy suite.

Quality assurance

RUSU remains concerned that several university functions under this policy suite lack robust quality assurance processes to support continuous improvement and internal review. In the absence of such mechanisms, complaints and appeals become the main avenue for identifying issues, which can negatively affect student experience and allow repeated poor-quality decisions—especially at local levels—to go unaddressed. RUSU recommends implementing internal reviews of decision-making within this policy framework, prioritising consistency, alignment with policy objectives and RMIT’s strategic goals, and overall quality.

Clause Based Changes to the Policy Suite

RUSU’s Advocacy and Welfare Team have reviewed the draft policy suite and have provided the following feedback on individual clauses.

Assessment Procedure - Academic Progress (Version 1 Draft 2)

Assessment Processes, 6.11.1: The chair of the relevant program assessment board (or in a vocational education program, the program manager) has discretion, however, not to classify a student as final stage at risk, but to allow them to continue in the program at first stage at risk, if the student is close to completing the program or where compassionate and compelling circumstances known to the school/industry cluster exist.

The text above has been extracted from the current Assessment Processes and appears to be absent in the proposed procedure. Removing this provision is a further tightening of university staff’s ability to exercise reasonable academic judgements and should be present in the redraft.

(31) Apprentices and trainees are not classified as at risk final stage; their academic progress is managed under their training contract.

Does this need clarification to include Victorian Certificate of Education, Victorian Certificate of Applied Learning students, and fee-paying Open Universities Australia students (as identified in the Assessment Processes)?

Assessment Processes, 6.15.: Exclusion has a significant impact on both the student and the University, so it is expected that the PAB will be satisfied that documented and reasonable attempts have been made to gain the student’s engagement during the period since academic difficulties were first identified.

The text above has been extracted from the current Assessment Processes and appears to be absent in the proposed procedure. Removing this provision removes responsibility of the university to engage with students who have been identified as struggling academically. The re-drafted policy suite should strengthen the university's obligations to proactively engage with students who are at risk of poor academic progress.

Assessment Procedure - Assessment Adjustments (Version 1 Draft 1)

(9) a. All students registered with Equitable Learning Services (ELS) who have extensions included as an adjustment in their Equitable Learning Plan (ELP), have provided authenticated diagnostic information in advance to the ELS Team. These students may apply for longer than the seven days extension, for a maximum of 14 days, provided they request the extension at least one business day before the original due date of the assessment.

Recent communications from the Equitable Learning Service to students registered with the service set a cap in place of 21 days, with any requests for extensions beyond 21 days triggering a review of support required by the student. This does not align with that recent change.

(10) EAP and EU courses are not eligible for short extensions. Extensions exceeding seven days are available as a special consideration outcome for EAP courses.

RUSU questions if there is reasonable justification for preventing these students from accessing short extensions. The threshold for special consideration is higher than that of an extension. Some students will have valid reasons to request a short extension that would not allow them to access a full seven-day extension under special consideration. This should be removed from the draft assessment procedures.

(21) Students must provide all relevant information and documentary evidence to finalise their application within three working days from the date they submitted their application.

This reduction in timeline for submitting evidence will negatively impact many students, particularly vulnerable students and those experiencing complex circumstances e.g. student needing a specialist appointment, students trying to obtain evidence from overseas, students with evidence that requires translation. Many students won't be able to meet this deadline despite best efforts.

(24) Students are not permitted to apply for special consideration for assessment/s in which there are student conduct concerns underway or where they have received a misconduct penalty.

This clause raises significant concerns around fairness and equitable access to special consideration. Suspected misconduct does not negate a student's experience of compassionate and compelling circumstances. This also builds further opacity into both the special consideration and academic misconduct processes. In instances where the misconduct allegations are later dismissed, will the university accept a late special consideration application? Both special consideration and academic misconduct processes are designed to uphold academic integrity and ensure equitable assessment, one should not be preferred over the other.

(26) Special consideration is available for assessments that are weighted 10% and over. Assessments that are weighted less than 10% are managed under the short extension process.

RUSU's concerns with this clause largely arise from the inconsistent way in which extension requests are managed at the local level. A student with compassionate and compelling circumstances that meet the eligibility requirements for special consideration might have a shorter extension request denied. This decision is not appealable and there is not option to access the more rigorous special consideration process as an alternative. RUSU suggests the addition that where an extension request for an assessment weighted under 10% is denied, students can continue to access special consideration.

(27) Circumstances that may meet the grounds for special consideration include (but aren't restricted to)... -

There are a few omissions from what is defined on the special consideration website. In our initial submission RUSU wrote in strong support of providing students with more and more detailed examples of circumstances that would be eligible for special consideration. RUSU suggests this section is expanded to provide a more comprehensive list of eligible circumstances.

(28) Special consideration applications are made in advance of an assessment due date wherever possible but can be submitted up to three working days after the due date. Applications will not be accepted on or after the official publication of the final result release date for the course.

This timeframe will undoubtedly disadvantage students whose circumstances directly prevent them from applying within this reduced application window. Accounting for the proposed reduced timeframe for students to supply supporting documentation, students would effectively lose 4 business days to finalise an application. These changes may disproportionately impact students, particularly vulnerable students and those experiencing complex circumstances e.g. student needing a specialist appointment, students trying to obtain evidence from overseas, students with evidence that requires translation. RUSU recommends returning to the current clause.

(30) Students are notified if their application is considered incomplete and have three working days from the date of application submission to provide the missing information or documentary evidence.

Same concerns as raised for (28)

Late Course Withdrawal Without Academic Penalty (LCWWAP)

(44) The Executive Director, Students or their nominee may grant a student late course withdrawal without academic penalty where a student:

- a. applies for further special consideration for a substantial assessment task for which they have already been granted repeated adjustments, or*
- b. has been provided multiple and/or reasonable adjustments for an assessment item and no further adjustments are possible.*

Currently Late Course Withdrawal Without Academic Penalty is already available to students at the third successful application for special consideration for the same assessment task. Wording to this effect is clear and well defined. The above clause is not defined and has the potential to lead to inconsistent application across schools and colleges e.g. some students are offered more adjustments to assessment before LCWWAP is applied compared to others based not on the strength of their special consideration applications but on the willingness of academics to provide multiple adjustments to assessment.

(58) Once registered, ELS work with the student to develop an ELP with recommended reasonable adjustments. Whilst these are recommendations, as the ELS team cannot be across the needs or learning conditions of each course, where an adjustment cannot be implemented, academic staff should discuss alternative adjustments with the student to remove barriers for the student as required.

Reasonable adjustments are not 'recommendations'. The Disability Standards state that providers are required to make reasonable adjustments where necessary for the students. If the university fails to do so, they must demonstrate that doing so would cause unjustifiable hardship, provided the academic integrity of the course or program can still be maintained with the adjustment. RUSU would recommend rephrasing to state:

*(58) Once registered, ELS work with the student to develop an ELP with recommended reasonable adjustments. **Reasonable adjustments are required by the Disability Standards for Education (2005).** As the ELS team cannot be across the needs or learning conditions of each course, where an adjustment cannot be implemented, academic staff **must** discuss alternative adjustments with the student to remove barriers for the student as required.*

Assessment Procedure - Assessment Management (Version 1 Draft 1)

(17) Group work is inclusive and accessible so that students with diverse abilities and backgrounds can fully participate.

This needs to include an explicit statement about the academic staff's commitment to work constructively and supportively with ELS and students ELP's to ensure this. RUSU recommends the following wording:

*(17) Group work is inclusive and accessible so that students with diverse abilities and backgrounds can fully participate. **Where group work includes students with an ELP academic staff must work constructively and supportively with the group and the ELS to ensure equitable participation.***

(43) Electronic submission (eSubmission) via the University's LMS is the required method for students to submit assessment work. Physical submission should only be used for assessment work that cannot easily be submitted via the LMS, such as creative works or physical artefacts. See the Assessment website for further information.

This clause should be expanded to include an alternative form of submission in the event of technological issues. This should include physical and email submission.

(43) Electronic submission (eSubmission) via the University's LMS is the required method for students to submit assessment work. Physical submission should only be used for assessment

work that cannot easily be submitted via the LMS, such as creative works or physical artefacts. *In the unlikely instance of technological difficulties preventing students from submitting via the LMS, email and hardcopy submissions will be accepted.* See the Assessment website for further information.

Assessment Procedure - Invigilated Examinations (Version 1 Draft 2)

'Examination arrangements' section 44 – additional information is required to provide detail on what constitutes a period of leave under approved supervision.

This procedure requires additional detail on the way recordings and data related to online examinations are collected, used, stored and disposed of. Suggested text includes:

Online invigilated examinations reproduce in-person examination conditions by: a. preventing access to unauthorised information b. authenticating student identity, and c. providing the opportunity to monitor and analyse student behaviour during examinations, via real-time invigilation. This does not include keystroke or eyeline analysis. Recording online examinations is also not permitted.

Assessment Procedure - Quality (Version 1 Draft 2)

(44)A PAB may grant a supplementary assessment to a student where:

- a. the student is enrolled in a higher education program with a total credit points requirement of 96 credit points or more, and
- b. the student has passed all other courses required for the program but has narrowly failed (with a mark of 45-49%) a course in what would have been their final semester, term or teaching period to complete their program, or
- c. the student is enrolled in the second-to-last semester, term or teaching period before they are expected to complete their program and has narrowly failed (with a mark of 45-49%) a core course, and this course isn't available in the final semester, term or teaching period in which the student is expected to complete their program, or
- d. a PAB identifies, due to formally identified pre- and co-requisite course requirements, the need to apply discretion to grant a supplementary assessment due to exceptional circumstances where an unreasonable delay to program completion could occur.

This section needs to clarify how the PAB should act when the eligibility requirements are met for a student in a Work Integrated Learning (WIL) course.

Assessment Procedure - Reviews and Appeals (Version 1 Draft 1)

(50)A student may appeal to the University Appeals Committee against a decision not to grant them an ELP or a decision not to provide them with an alternative assessment arrangement...

The current Assessment Processes stipulates: "A student may appeal to the University Appeals Committee against a decision not to grant them an equitable assessment arrangement (EAA) or against a decision not to provide them with an alternative assessment arrangement (AAA)".

By the same token, the current Assessment and Assessment Flex Policy states: "(65)A student may appeal a decision to deny them an equitable assessment arrangement, or the conditions of a granted equitable assessment arrangement, by the process set out in the appeals section of Assessment Processes" (reference to AAA's is absent here)

The Assessment Processes does make a distinction between EEA's and AAA's (including how they are negotiated and approved), but by the same token.

There are already inconsistencies with this clause among current policies, so it would be helpful if they proposed procedure addresses this!

Assessment, Academic Progress and Appeals Regulations (Version 2 Draft 1)

Whilst RUSU does not have feedback on any specific sections of this procedure we do want to reiterate our deep concern around the lack of student appeals that receive hearings due to pre-screening. Students are not afforded an opportunity to make a full case for appeal through a written submission only.

CONCLUSION

RUSU acknowledges the work undertaken to restructure the Assessment and Assessment Flexibility Policy Suite, yet finds the current draft lacking in ambition, innovation, and alignment with the University's stated strategic priorities. The redrafted suite misses key opportunities to embed bold assessment practices that reflect the aspirations of *Knowledge with Action*, the Education Plan, and the IDEA Framework. Instead of advancing inclusion, flexibility, and equity, proposed changes, particularly those limiting access to special consideration, risk disproportionately disadvantaging already marginalised students.

The review has also not adequately addressed opportunities to balance staff workloads and with student support, strengthen quality assurance, or ensure that assessment processes are both supportive and consistent. Without improvements, complaints and appeals will remain the default mechanism for addressing flaws in implementation, undermining student trust and the University's own strategic goals.

RUSU believes the policy suite can and should be a key driver of meaningful change. We recommend reforms that include:

- embedding inclusive design principles into assessment adjustments and academic progress processes,
- ensuring fair and flexible access to special consideration, including proactive and trauma-informed approaches,
- implementing a strengthened and supportive Academic Performance Improvement Plan (APIP) with a pathway back to good standing,
- expanding access to appeals and alternative resolution processes,
- and introducing robust quality assurance mechanisms to underpin continuous improvement.

These measures would bring RMIT into alignment with sector-leading practice, reduce unnecessary barriers to student success, and foster fairer, more compassionate, and more effective assessment processes. By enshrining these commitments in policy, RMIT has the chance to create a framework that genuinely supports learning, builds student confidence, and delivers on its promises of inclusion, flexibility, and excellence.

