

Submission to the Ministry of Education on the Proposed Changes to the Compulsory Student Services Fees Mechanisms

VUWSA



**Co-written by Victoria University of Wellington
Students' Association (VUWSA) and members of the
Student Assembly of Te Herenga Waka – Victoria
University of Wellington**

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Introduction

The below submission has been written by the Victoria University of Wellington Students' Association (VUWSA) in collaboration with several student groups who sit on the Te Herenga Waka - Victoria University of Wellington Student Assembly. The Student Assembly is comprised of multiple student representative groups, including faculty, equity, and advocacy groups on campus. Working together, the Student Assembly stands as a key consultation group on issues and proposed changes both internal and external to Te Herenga Waka – Victoria University of Wellington.

Below is a list of the groups whose views are reflected in the submission. Some of these groups have opted to write their own section to outline the specific views of their representative groups. Other groups have read over and agreed with all sections of the submission, so have simply asked to have their name added in support.

In the case of those groups who have written a specific section, this section will be outlined by an underlined heading of the representative groups name. All other sections can be taken as the perspective of VUWSA, with the support of all groups noted below.

Groups whose views are reflected in this submission.

Victoria University of Wellington Students' Association (VUWSA)

VUWSA is the overarching representative group of all taura at Te Herenga Waka – University of Wellington and exists to help VUW students during their time at university. From representing students' interests at all levels of university, through to providing services, events, and support; we want to make sure VUW students' time at VUW is the best it can be.

We advocate for students both within and outside of the University and are frequently involved in campaigns to create a tertiary system that is student focused, and a Wellington that is student friendly. We run several student consultation bodies – such as Student Assembly – and host various social events – including O-week – throughout the year. It is VUWSA's firm belief that, if providers and the Government really want to put the needs of students first, then we must be engaged with as partners in all processes that impact our lives and studies.

Ngāi Tauira

Ngāi Tauira is the Māori Students' Association at Te Herenga Waka - Victoria University of Wellington. Ngāi Tauira advocates for the needs & interests of Māori students at the University and promotes & supports success as Māori in tertiary education. In addition, Ngāi Tauira work to ensure that taura Māori have a safe space to be Māori, be around other Māori & to feel connected to their Māoritanga. We run and facilitate events that support Māori academic excellence & promote whakawhanaungatanga.

As an association we believe in the celebration of being Māori & being Māori in tertiary education. Nō reira, ko te wero ki mua i a mātou o Ngāi Tauira: me akiaki, me poipoia, me whāngai i a rātou te hunga taura Māori, kia Māori te tū ki te whare wānanga. Tēnā, kōkiri rā!

Victoria University of Wellington Pasifika Students' Council

The Pasifika Students' Council (PSC) of Victoria University of Wellington, endeavour to represent the voice of all Pasifika Students at our university. During Trimester 1 of 2021, we represented over 1300 Pasifika students, with many diverse Pasifika backgrounds. This includes both domestic and international students, from all three sub-regions of the Pacific Micronesia, Polynesia, and Melanesia. The Pasifika population is the Fastest growing young population in New Zealand. We believe that with adequate support, this growth will be represented in tertiary education in the near future.

As Pasifika students, we are at a disadvantage in the education system in many ways. As minorities, most decisions that are made do not often take into consideration the ramifications that will affect us. Because of this, we are grateful for the services that are tailored specifically for Pasifika students. These services encourage enrolments, motivate retention, and inspire completion of our studies. We are strongly of the opinion that education is the key to reduce poverty in our communities. Therefore, we place heavy emphasis on the importance of retaining Pasifika support at our tertiary education.

UniQ

UniQ Victoria is the Queer Students' Association of Te Herenga Waka—Victoria University of Wellington. We are a student-led group, controlled by queer and queer-allied students, working in the interests of all queer students.

We provide students with social support and services that promote their health and wellbeing, and advocate of behalf of queer students to ensure the University is a safe and inclusive environment.

Victoria University of Wellington Disabled Students Association (Vic DSA)

The Disabled Students Association is the representative group for disabled students at Victoria University of Wellington. We aim to create a social space for disabled and impaired students, and advocate against ableism in the educational system.

Victoria University of Wellington Commerce Society (VicCom)

VicCom is the official representative body for Commerce students and is one of the largest societies at Victoria University of Wellington. We strive to assist students in having the best possible experience while simultaneously providing opportunities to open doors for a successful and meaningful life after university. This is achieved via promoting and fostering an inclusive community of students studying commerce at Victoria University of Wellington and promoting the study of commerce at Victoria University of Wellington. We also host a range of Academic and Social events throughout the year, examples include Mock Interviews, Study Sessions, Cocktail night and the annual Commerce ball.

Victoria University of Wellington Law Students' Society (VUWLSS)

The Victoria University of Wellington Law Students' Society (VUWLSS) is a representative group run solely by law students, solely for law students. VUWLSS has two major functions. The first is to advance and promote educational opportunities for law students at all levels. This is achieved in several ways. VUWLSS presents opportunities for students to hone their legal skills through competitions, lectures and study groups. The other very important function is to enhance the law school experience – making it more rewarding, dynamic and interesting for students.

VUWLSS serves the interests of students outside of the classroom through sell-out social events, engaging speakers, and enviable opportunities for further learning and hands-on experience. As the most active faculty group on campus, VUWLSS aims to enrich the experience of law students by working collaboratively with our partners to advocate for our student's needs.

Rainbow Law Students at Victoria University of Wellington (Rainbow Law)

The Victoria University of Wellington Rainbow Law Students' Society exists to build a supportive and inclusive community for LGBTQIA+ law students and within the greater legal community. We advocate on student's behalf, connect with people working in law-based professions, and work to create an informed, welcoming and respectful culture at Law School and beyond.

Substantive Questions

Does the current framework for CSSFs give the Government enough discretion to specify requirements on providers that charge a CSSF?

It is of the opinion of VUWSA (Victoria University of Wellington Students' Association) that the issue is not so much around the inclusion of further specifications on the various CSSF requirements, but rather, what is being done with the current specifications outlined under both the Act and the Ministerial Direction. Although further specifications on reporting, quality of services, student consultation, and engagement of student perspective within the SSF setting process would benefit students, it is important to note the level of specification currently required by the Government, and how this is being upheld. It is unlikely students will feel that any additional specifications will lead to lasting change, if the current specifications in place are already not being appropriately upheld or enforced.

VUWSA is of the belief that, alongside these substantive changes to the CSSF mechanisms, there must be a review done as to how effective the Government has been in ensuring that the specifications in place are currently enforced. Adding further specifications will do little if the Government continues to stay at arm's length from ensuring these are adequately followed.

Alternatively, there is general concern from VUWSA that the increased involvement of the Government in the specification, and general process, of the SSF may lead to major political interference in the way providers and students' set their local CSSF. Having greater Government control may be beneficial when a student-friendly government is in power, but the ongoing impacts of Voluntary Student Membership still has many student associations concerned that the vesting of more power to Government could potentially be to the detriment of them and their Associations. We believe further guidelines are to the benefit of student voice, but there is a fine line to be hit in terms of the level of further government involvement.

Vic DSA

No, we agree with VUWSA that there needs to be a higher degree of specification. There must be improvement to the transparency and effort made to ensure students understand what the CSSF is, exactly what it is going towards, and how that will benefit them. Ensuring that tertiary providers use CSSFs to provide high-quality health, disability, and inclusion services would be of great importance to the accessibility of an institution.

Do current settings on CSSFs incentivize tertiary providers to involve students in decisions on CSSFs?

Inclusion in CSSF Setting Process

Although the current settings on CSSF's do incentivize tertiary providers to consult and engage with students on CSSF decisions, it is not to a great enough extent. At the majority of Universities, and particularly at Te Herenga Waka – Victoria university of Wellington, students are, at most, given the opportunity to advise on the way in which our Student Service Levy is used. This is generally done through the establishment of advisory committees, such as the Advisory Committee to the Student Services Levy (ACSSL) at VUW, which consist of both staff and students.

Despite these advisory committees bringing students into the process, the key point of these committees is that they can only 'advise' the final decision maker, generally the Vice-Chancellor, as to where Levy funding should be spent. Although it is unusual for the V-C to go against the advice of

the advisory committee, there is still no final decision-making power in the hands of students. Theoretically, should the Vice-Chancellor wish to, they may completely bypass or overrule this advice, with little to no consequence and no statutory safeguards. This level of engagement does not constitute genuine partnership between staff and students.

The CSSF is paid annually by students to provide services which directly impact upon their life while studying. Bearing this in mind, giving students further control over the way local CSSFs are set would ensure and uphold partnership between students and staff. It is the opinion of VUWSA that the best way to go about this is through the mandatory requirement at all institutions of co-governance boards for any decisions to do with the CSSF. These boards would be based in Te Tiriti and student partnership, with tangata whenua and taura Māori voices hold a strong presence around the table.

These co-governance boards would involve the Vice-Chancellor, or any other major decision maker, meeting with student representatives and senior services staff, to make a joint decision as to how the CSSF should be spent and divided between services. VUWSA would envision a process which requires the ultimate consent and consensus of all parties involved. This would not only put more power in the hands of students over the services they interact with the most, but would also encourage and foster an environment of genuine student-staff partnership and co-design of the tertiary system. Student voices deserve to be part of the final decision on where their CSSF is spent.

Consultation and Clarity of Information

The above-mentioned current advisory committees currently function as one part of each providers consultation process, through which institutions seeks to gain student feedback and voice on their CSSF arrangements. Alongside this process, providers also distribute information on their website, and through other digital and print mediums, and will use student representatives to gather further consultation from the student body. However, this level of consultation, and engagement, is not adequate. Recent online surveying on students via our VUWSA Instagram channel has showcased that 74% of the 1,232 people (mostly students) who answered our survey had engaged with key student services funded by the SSF. Despite this, only 12% out of the 1,148 of those surveyed (mostly students) on our second question “Did you know what ACSSL was or how the SSL was set before this?” answered saying they knew what the processes behind the setting of CSSF at VUW was. These numbers speak volumes around the accessibility of this information.

This lack of knowledge from the student body comes from two particular issues. Firstly, the student representatives who are responsible for engaging with the student body on the CSSF are not resourced well enough to adequately carry out this job on an annual basis. VUWSA receive proportionately the lowest amount in comparison to any other levy funded Student Association, given roughly 6% of the overarching SSL. Given that student representatives are, first and foremostly, students, it can make consultation exceptionally difficult with the resources at hand. Often, the consultation time frame clashes with examinations and assessments, making it hard for students to run and engage with this consultation.

Secondly, the information given by providers on their CSSF structures and processes tends to be inaccessible or not clearly outlined. Information, although available on the University website, is not heavily publicized, and there is little context given around the local CSSF when students sign up for their university experience. As noted above, there is a significant number of students who do not understand the full scope of the CSSF framework, including its purpose, its impact, and how their money is being used.

There must be changes to the mechanisms to ensure that the onus is on providers to run robust CSSF consultation and engagement, or further resource their Students' Associations to do so. The current framework does not incentivize providers to proactively inform students around the CSSF usage and proportional divvying.

Priority Groups

The university identifies a number of student groups as being of priority around support and assistance throughout their studies. These groups include taura Māori, Pasifika students, disabled students, and international students, to name a few. Each of these groups have specific, levy funded services provided to them, these being Āwhina, Pasifika Student Success, Disability Services, and Wellington University International, respectively.

Given that each of these groups have key support services provided to them which are at least partially funded through the CSSF framework of VUW, it is absolutely crucial that whatever changes are brought to the CSSF mechanisms incentivise providers to further engage with their voices. This is not just reflective of these key groups, but of every student group that has a particularly acute stake in the way the levy is used and delivered. For example, should a new Rainbow and Inclusion student advisor be appointed to an institution, it is critical that local rainbow and LGBTQIA+ representative groups are adequately engaged in the process. As it currently stands, the CSSF mechanisms must do more to further ensure that these priority groups play a key part in informing the services which are delivered to them.

Vic DSA

While the current settings on CSSFs incentivize tertiary providers to involve students in decisions on CSSF, Vic DSA believes there could be further changes made to ensure tertiary providers take student voices into account. Meaningful consultation about what services students find value in and what services they would like to see in future would be an improved approach. However, we would argue that student voice should be at the heart of tertiary institution's decision-making processes and that consultation is not enough. We agree with VUWSA's proposal that CSSFs should be set in co-governance with students, following a partnership model, rather than just consultation.

However, Vic DSA does see value in the proposed requirements for universities to engage with different student groups and marginalized and minority groups. Disabled students often know their own needs better than anyone else and should be involved in decisions about what disability and health services are offered on campus so that campuses are able to create the most accessible and inclusive environments they can. Despite this, this approach does run the risk of becoming tokenistic. Any partnership model would need to be adequately resourced so that students are able to meaningfully engage in decision making processes in an accessible and inclusive manner.

VicCom

Strength of Relationship

In addition to the comments made above, it is necessary for further incentivization of providers to engage students in the CSSF process for the sake of the process's integrity. It must be ensured that, regardless of the relationship between providers and their Student Associations' and bodies, students are proactively engaged in the process as partners. There has been examples in the past of poor relationships between providers and student groups leading to the student voice being disengaged or entirely left out, further exacerbated by the presence of huge power imbalances between the two parties. In order for any changes to the CSSF framework to benefit students, there

must be incentives to ensure that, regardless of the state of their relationship, providers and students work together throughout the process.

PSC

PSC believe that there is no incentive for tertiary providers to involve more minority voices in decisions on CSSF. At our university, (Te Herenga Waka - Victoria University of Wellington), there is consultation with two student representative groups, who sit on a committee called the Advisory Committee to the Student Services Levy (ACSSL). A Pasifika representative does not sit on this committee. Contributions by Pasifika students are channeled through the ACSSL. We do not believe that this is adequate and does nothing to encouraging equity. We have concerns that our missing voice in this sphere, puts us at a higher risk of losing valuable support services that greatly contribute the success of Pasifika Students, such as the Office of the Vice Chancellor (Pasifika) and the Pasifika Student Success team.

Theoretically, if the representatives on the ACSSL were not supportive or found little value in Pasifika Student Success, the services we rely on could potentially become more under-resourced. To secure future support of Pasifika students, there needs to be more incentives in place, that require the university to consult more with what they may categorise as "Priority Groups".

Under the current framework for CSSFs, are the current arrangements at tertiary providers for different types of student's fair? (For example, extramural students or part-time students)

Speaking only from the perspective of students' at Te Herenga Waka – Victoria University of Wellington, there is a number of discrepancies within our internal CSSF system which makes the arrangements manifestly unfair. Fortunately, a review is currently underway to address these issues at Te Herenga Waka, with the possibility to switch to a per-point based system. However, this has been a long time in the making, and it is worth outlining some of the major issues here, as they may be prevalent at other providers.

Currently there are several different criteria which define how much a student pays in CSSF. These are: whether the student is on-campus or off-campus; whether the student is off-campus within the Wellington region; or whether the student is studying above 25 points or not (generally above one paper). For those students who are on campus and studying above 25 points, they will pay the full CSSF, which this year equates to \$843. Those enrolled in 25 points or more, but are off-campus and outside of the Wellington Region or New Zealand will pay \$421.50, which is also the same amount paid by those who are enrolled in less than 25 points and on-campus/off-campus within the Wellington region. Finally, those enrolled in less than 25 points, but who are off-campus outside of Wellington region or New Zealand pay \$210.75.

International Students

One clear example of the unfair nature of CSSF payment is that of international students. At Te Herenga Waka, international students may arrive on-campus at a date which is outside of the scope of domestic students. For example, some international students, due to the current immigration situation caused by Covid, may have only returned to New Zealand, and on-campus study, by week 10 of Trimester 1. This means that their levy payment will move from \$421.50, to \$843.00. They will be asked to pay an additional \$421.50 on top of what they have already paid, despite the fact that they will have missed out on nearly an entire trimester of in-person student service usage.

Difficulty Gaining Rebates

Students are able to gain rebates for being overcharged an SSF due to their changing circumstances, such as finishing/withdrawing from their study early. However, when students are in the position for a rebate, there is a lack of understanding of the rebate process, which in itself is inaccessible. This can lead to students being confused as to when they are eligible for rebates, or just flatly missing out on a rebate by not getting in contact before the cut-off date.

Many students will have to go through a manual system to gain a rebate. This involves emailing student finance, and often requires a large amount of time spent on ascertaining what their level of rebate is. This system is confusing for students, and often leads to many feeling frustrated and becoming disincentivized to seek a rebate in future.

Inequitable SSF Payment and Rebate Levels

The current system of SSF payment is largely inequitable, as it requires all students studying above 30 points to pay the same amount. For those on-campus students studying fewer than 25 points in an academic year, they can receive a 50% rebate. However, any student enrolled in a single 30-point course, or any two courses, will be charged the full SSL amount. For many of the latter students, their SSL fee is roughly half of their tuition fees. Many students see this as being excessively, and unfairly, expensive.

Generally, those students with lower course loads, and thus lower point amounts, will not be on campus as much as those with three or four courses. This means they will not engage with the present student services anywhere near as much as someone who is doing upwards of 80 points on-campus but are still forced to pay the same amount as the latter towards the CSSF. This therefore creates an inequitable distribution in terms of how much each party pays.

In addition, the question could be raised as to why an off-campus student, who uses online learning to complete their degree, pays anywhere near the current required level of money at all. Although some services of the University are available online, these students will still likely have a reduced level of engagement with them.

CSSF in the Age of Covid-19 and Dual Learning

VicCom

In addition, many students have access to dual-delivery online learning programmes. These students may feasibly study online whilst living within the Wellington region, but never once engage with any of the in-person services which require the bulk of CSSF funding. This would seem unfair for these students who are able to complete their studies without even stepping foot on campus to pay such high levels of student service fees.

VicDSA

Alternatively, many students who are chronically ill, immunocompromised, and/or disabled may feel uncomfortable coming onto their university campus while Covid-19 is still at large. These students may be studying full-time but may never return to campus full-time. Despite this, they will still be considered on-campus learners, and required to pay the on-campus level of CSSF payment. In the example of disabled and immunocompromised students, these members of the University community face particularly acute financial barriers which impact on their study and health, this must be considered by tertiary providers when making decisions on the CSSF.

What requirements should the Government be able to place on tertiary providers that charge a CSSF and how should these change over time to respond to system changes or sector feedback?

VUWSA believe that the requirements the Government is able to place onto tertiary providers charging a CSSF must cover three key areas – governance, consultation, and distribution of information.

Governance

As noted above, VUWSA believes that there must be requirements placed upon providers for student co-governance over their CSSF system. This co-governance must cover the areas of distribution and usage of the CSSF, as well as set increases to it. In addition, the processes involved in consultation and engagement must seek to reduce the immense power imbalance that exists between these two parties, particularly in institutions with historically weak or under resourced student voice, and set the standard for ensuring a proactive, student focused tertiary education system.

Consultation

The Government should be able to place requirements around provider consultation with students. This would complement the additional requirements around student governance, holding to account any co-governance board which were to exist within institutions. This could include mandatory criteria for what equates to adequate consultation, and a set schedule of consultation times across all institutions which charge a CSSF. The latter would solve the issue of student opinion only being included in the tail end of changes made to the CSSFs, once decisions have largely already been made on these potential changes.

Distribution of Information

On a similar vein, the lack of student understanding on CSSF processes indicates that further requirements must be placed upon providers to ensure that students charged a CSSF have adequate understanding on its processes and structure. This would include requirements to undertake more accessible reporting, annual information outputs, and further resourcing to Students Associations' to allow them to engage with students on this on the providers behalf.

Changes over Time

In regards to changes over time, it is important that the setting of each of these requirements include some section or amount of student voice. It is particularly important that, as specific student groups grow in population and usage of services funded under the CSSF, requirements are placed on the providers to engage those students in decisions made around the CSSF. Key example of this include Pasifika and International students, the former of which has a rapidly growing population within our tertiary sector, and the latter of which often pays exceedingly high international fees and are thus relied upon by providers for financial stability. Both groups also have key services provided for them through the CSSF, and there must be some mechanism put in place to ensure that these, and other growing or priority groups within universities, have their voice accounted for.

Thus, the requirements placed on providers who charge a CSSF must be responsive to the ever-changing needs of the student population. This also raises the necessity of the Ministry itself hosting ongoing consultation with the student body, and providing accessible avenues through which students and student associations' can submit feedback on their providers current CSSF usage.

Vic DSA

Vic DSA agrees with VUWSA that co-governance and partnership needs to be mandated by central government. Providers currently follow a process of “consultation” and student “voice”. This is an

inadequate approach and is often tokenistic and exclusionary. If the Government wants to be consistent and invested in its learner-centred approach, it needs to focus on meaningful partnership.

For disabled students, and other equity groups, to be involved in partnership around the CSSF, the Government will need to ensure that providers are encouraging equitable participation. This means student voice should be resourced, meetings should be accessible and safe, and information should be distributed in a way which is accessible and easy to digest. This would recognise the barriers facing disabled students when it comes to engaging in co-design processes, and needs to be mandated from a top-down approach.

VicCom

VicCom are in full agreement with VUWSA's suggestion of student co-governance. We think this will help with ensuring the University is incentivised to involve students in the decision-making process. Decisions are currently being made about how services are being funded and provided, with very limited student perspectives/consultation being included. If consultation is included, it is usually included at the later stages of the proposed decision, which leaves very little room for the University to change the decisions that they have already made, thus leaving students disappointed as they feel that their voices may not have been heard.

These decisions and proposals have an impact on most, if not all, students, therefore having a co-governance board will allow for a diverse range of student perspectives to be included from the beginning. The board will also help in providing further transparency between the University and students around CSSF usages.

PSC

We strongly encourage the government to introduce a requirement that ensures minority student groups are more represented during consultation on decisions with expenditure of the CSSF, with their tertiary provider. We agree with the idea of co-governance between tertiary providers and their students, however, there needs to be assurance that resources are being allocated to services that our students find beneficial. We feel this extra security will come with the requirement of minority student consultation by the key decision makers - themselves.

We believe that there should be a mandate on educating students on what the CSSF is that is modern and more accessible to students. The forms presented during enrolment is not satisfactory and the language used often makes it difficult to understand. We suggest videos, that also cover where students may get information on expenditure, where to find the report, and a clear description of how the consultation process works. There needs to be better education on what services are available to students on enrollment. Majority of knowledge on the CSSF is distributed by word of mouth.

What consultation process should the Government go through to make future changes to the CSSF framework, as enabled by the proposal in this discussion document?

It is absolutely imperative that the Government provides robust consultation with students, student associations' and other respective representative groups when making future changes to the CSSF framework. This includes the development of a consultation timeline that works around the needs and availability of students at each campus. This timeline should be co-developed alongside students from different institutions, and should seek to give the best opportunity for student feedback.

In-person on-campus consultation, alongside accessible online consultation, would provide the best and most engaging form of consultation with the student body of different providers. This consultation process would involve consultation with students' associations and representative groups, consultation with providers, and consultation directly with the general student body. These three areas would allow for the most impactful form of consultation. It is also important to note that consultation with staff members who work on the ground in the services must also be facilitated.

Consultation must be carried out to some extent at each institution, ensuring that whatever changes are brought out are reflective of the wide range of student views and opinion. Possible ways to streamline this process could be done through breaking up the type and timeline of consultation between Universities, Polytechnics, and other tertiary institutions, so as to reflect the differing needs of each.

In addition, there is need for the Government to investigate its current engagements with students. The question must be asked as to how the Ministry can look to implement co-design in its various sector changes and daily running. If this Government wishes to be truly student-focused, it must approach their dealings with students through the lens of genuine partnership. This also extends to ensuring Te Tiriti partnership is adequately upheld throughout.

Vic DSA

Vic DSA agrees with VUWSA that the Government needs to move beyond consultation to partnership and should engage with Students' associations and representative groups. In order to engage with disabled students, consultation should be done through various different mechanisms and forums. This should include on campus consultation sessions, Zoom sessions with disabled rep groups, surveys, and other opportunities which are accessible. The process also needs to uphold Te Tiriti o Waitangi, and thus the Government ought to work closely with tangata whenua and particularly taurira Maori rōpū and associations. To uphold our obligations under Te Tiriti and the United Nations Convention on the Rights of Disabled People, consultation and information also needs to be available in Te Reo, New Zealand Sign Language, and Easy Read.

To meet the needs of disabled communities, and to follow a Te Tiriti approach, the government also ought to engage with the wider community and student support networks. This includes whanau, staff, and disabled persons organizations. Finally, in order to facilitate consultation and partnership, the Government also needs to encourage equitable participation. Information circulated should be in simple English, available in multiple formats, and not jargon-heavy. This will ensure that students, an already overworked population group, are able to be involved. It will also be particularly beneficial for students who are neurodivergent or have learning disabilities or sensory impairments. During consultation, the Government should take time to educate students on the current framework and the proposed changes.

PSC

We believe that the consultation process should reach out directly to more student representative groups. PSC are at a great disadvantage because we receive notifications of consultations 'second-hand'. As students who rely greatly on services funded by the CSSF, we have great concerns that important decisions that affect us are being made without our contribution.

We recommend that the government create a presence on campus with consultation sessions that appeal to the growing diversity of students. These consultation sessions need to be environments that feel safe, where students are free to voice their opinions.

There must be a mandatory step, where there is consultation with minority student representatives, separate from those who are on the ACSSL. This is to encourage equity and to ensure that minority voices are heard. This step needs to be genuinely focused on hearing opinions from those who may not have the opportunity to ever have their opinions on CSSF voiced.

Considering COVID-19, future consultation process' need to consider international and domestic students who are not physically able to attend consultation events in person. We recommend online discussion sessions. We recommend online discussion sessions, that also take into consideration the students who do not have 24/7 access to computers and internet.

How much notice should the Government need to give to make changes to the requirements on tertiary providers charging a CSSF, particularly for providers implementing changes?

In order for there to be a clean, robust, and well managed period of change to the current processes, VUWSA believes there must be a minimum period of 6 months to allow time for proper consultation on possible changes. This is dependent on the time of the year. Government changes will likely require the provider to consult with their student body to ensure they have legitimate mandate and support for any adaptations to their internal CSSF processes.

This consultation must fit around the timeline and schedules of students, and should align with the two main semesters of all tertiary institutions. These requirements will ensure that students are given a decent opportunity to respond and have their voices heard.

Vic DSA

Vic DSA believes that short time frames are one of the greatest impediments to consulting with the disabled community. Thus, we agree that a period of at least six months should be allowed to consult and engage upon these changes. Six months is a short period of time, however, for co-development. Therefore, when it comes to co-design with mandated student associations, the Government should ensure these groups are resourced so that they are able to engage in the process meaningfully.

PSC

Provided that there is adequate consultation, in line with what we have already suggested, PSC are in agreeance with a 6-month minimum notice period. In addition, there are a number of other important considerations to be noted.

Our Pasifika students have more time restraints during periods of important community events like language week celebrations, independence days, and nationwide conferences. These timelines also need to be considerate of representative groups and students who are not paid, or who do not receive any compensation for their time. Our students are often disadvantaged as they must work to provide for their families, in either full-time or part-time positions. More often our students are choosing to work, or study, instead of engaging in the consultation of the important things that affect us.

There should also be consideration for the possibility of an 'extension'. We often receive information that consultations are happening second hand, therefore are more disadvantaged. Alternatively, as mentioned earlier, all representative groups could be directly contacted during the initial stages of consultation.

We agree that consultation periods need to align with the two main trimesters. The majority of our student population do not normally reside in Wellington and go home for the holiday period.

What timeframes for managing any changes to the CSSF framework do tertiary providers consider sufficient to adapt?

Although this question is not aimed specifically at Student Association's, it is worth noting that student voice must be involved in the setting of any timeframes for managing changes. This will ensure that these timelines give enough space for students to have their voices and opinions included, and will allow for adequate and realistic timeframes for student engagement.

PSC

PSC would like to respectfully acknowledge that providers also have steps they must satisfy before changes are made and that these providers are made up of many hardworking staff. These staff also experience the unpredictable nature of life, so further transparency during these periods is extremely important.

Conclusive Comments

VUWSA is broadly in support of the proposed changes to the CSSF framework. These changes are much needed, and likely to set the current course of provider run CSSF processes in a positive direction. Although there are some further minor tweaks which we believe must be made to ensure these changes happen smoothly and effectively, on the whole we welcome the proposed changes, and look forward to continuing to work with the ministry. We are pleased to see the Ministry, and wider Government, looking at ways to further entrench student voice and partnership throughout our tertiary sector.

In particular, the feedback given on consultation and student partnership does not just apply internally to providers. We hope to see the Government and Ministry looking to implement a genuine level of partnership with tertiary students, and to turn to working with these learners in a mana enhancing way.