



HIGHER EDUCATION STANDARDS  
PANEL CONSULTATION ON  
AMENDMENTS TO THE HIGHER  
EDUCATION STANDARDS FRAMEWORK  
(THRESHOLD STANDARDS) 2021

March 2026

University of the Sunshine Coast submission

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## Executive Summary

The University of the Sunshine Coast (UniSC) welcomes the opportunity to respond to the Higher Education Standards Panel (HESP) consultation on proposed amendments to the Higher Education Standards Framework (Threshold Standards) 2021. Our submission draws on our institutional practice experience, sectoral considerations, and the detailed reflections provided through our internal analysis of how the standards are being implemented at UniSC.

Broadly, we believe the proposed reforms represent an important opportunity to modernise the standards while preserving their principles-based intent, ensuring regulatory coherence, and supporting meaningful, sustainable improvements in student and staff experience.

Strengthening the Threshold Standards is an important opportunity to reinforce national expectations for safety, equity, inclusion, integrity, and effective governance while maintaining the flexibility essential to a diverse higher education sector.

We believe that a principle-based, proportionate approach, supported by targeted guidance rather than prescriptive regulation, will deliver the greatest long-term benefit for students, staff, HE institutions, and the broader community.

## Summary of recommendations

### 1. Demonstrating a commitment to addressing racism

*Recommendation 1:* Clear, institution-wide commitment to addressing racism is best achieved through governance led, whole of institution approaches, rather than overly prescriptive compliance requirements.

*Recommendation 2:* UniSC recommends the provision of clear, practical guidance on how existing standards can be applied to address racism, supported by good practice examples, community-informed approaches, culturally safe reporting mechanisms, and alignment with external frameworks such as anti-discrimination and human rights obligations.

*Recommendation 3:* UniSC recommends strengthening expectations within existing standards as the best way to produce the most integrated, proportionate and sustainable approach to addressing the persistence of racism within Australian HE.

### 2. Incorporating the governance principles and transparency requirements

*Recommendation 4:* UniSC recommends a universal, principles-based approach to promote clarity and equity across the sector.

*Recommendation 5:* UniSC recommends that a principle-based approach remains essential for effectiveness and proportionality of the Higher Education Standards Framework.

### 3. Supporting people with disability in Higher Education

*Recommendation 6:* UniSC recommends embedding universal design across curriculum, digital systems, assessments, physical environments, and administrative processes, to reduce the need for individual adjustments and improve outcomes for all students. A whole of institution approach will benefit both students and staff, reflecting diverse capabilities and strengthening workforce participation.

*Recommendation 7:* UniSC recommends embedding inclusive practice into campus and infrastructure design, recruitment, retention, professional learning, and organisational culture.

#### 4. Responding to emerging technologies in the Threshold Standards

*Recommendation 8:* UniSC recommends that an alternative such as “emerging digital and educational technologies” may more accurately reflect sector use and purpose.

*Recommendation 9:* UniSC recommends that the focus of attention should be on clarifying that emerging technologies fall within existing governance and risk frameworks to ensure consistent interpretation of how the use of these technologies may impact on students’ learning and the conduct of research.

*Recommendation 10:* UniSC recommends that amendments should remain technology-agnostic and focus on issues related to impacts on students’ learning, equity, and ethical use, as well as the impacts of technology on academic integrity, data management, and governance accountability.

#### 5. Approach to a cyclical review of the Threshold Standards

*Recommendation 11:* UniSC recommends that the review of the standards be structured and evidence informed, mapping issues against existing standards, guidance, legislation, and regulatory practice, and that reviews should be conducted using mixed methodologies.

*Recommendation 12:* UniSC recommends that consultation occur across multiple stages of the review cycle and include transparency regarding how feedback is considered and applied.

## Introduction

The University of the Sunshine Coast (UniSC) welcomes the Higher Education Standards Panel consultation on amendments to the Higher Education Standards Framework (Threshold Standards) 2021 and is pleased to provide a submission to inform the consultation process.

UniSC would welcome the opportunity to elaborate on any aspect of our submission. If this is of interest, please contact Professor Michael Wilmore, Deputy Vice-Chancellor (Academic) at [DVCAcademic@usc.edu.au](mailto:DVCAcademic@usc.edu.au).

### About UniSC

Since opening our doors in 1996, UniSC has grown to be a vibrant and globally recognised institution founded on the idea of servicing its regions and transforming lives through learning and knowledge. We have achieved remarkable success in equity, diversity, and inclusion, and have had a significant impact in our regions, generating productivity, innovation, educational participation, and incredible social and economic benefit.

Our award-winning facilities span five campuses across Southeast Queensland, an area of unique geographical importance. UniSC is the world's only university with campuses on three connecting UNESCO biosphere reserves, including the World Heritage listed K'gari. At the end of 2024, UniSC also opened a new campus in Adelaide, in partnership with a leading education provider, offering students an expanded choice of study locations and further enhancing the University's national presence.

UniSC's Strategic Plan 2025-2028, *For a Better Tomorrow*, expresses a sincere and long-standing commitment to making a positive difference in the lives of others. Our purpose, to transform lives through learning and knowledge in every place we operate and with every community we serve, describes our focus on genuine collaboration with our communities, taking a place-based approach that appreciates the unique character of our own university campuses and their social, cultural, and environmental landscape.

## 1. Demonstrating a commitment to addressing racism

### 1.1 What specific actions should higher education providers be required to take to demonstrate a clear, institution-wide commitment to addressing racism?

**Recommendation 1:** Clear, institution-wide commitment to addressing racism is best achieved through governance led, whole of institution approaches, rather than overly prescriptive compliance requirements.

The consultation paper's discussion of racism recognises what recent national studies have made also made clear: racism within higher education is widespread, systemic, and deeply harmful to both student and staff wellbeing. The Australian Human Rights Commission's Respect at Uni findings reveal that racism manifests across learning environments, administrative processes, leadership capability, and institutional culture, resulting in reduced trust, poor safety outcomes, and diminished participation. UniSC recognises that universities play a critical societal role in confronting long entrenched norms and attitudes, and that genuine progress requires a "rising tide" movement, involving collaboration between government, higher education, schools, and vocational sectors, rather than compliance led, piecemeal actions.

We support approaches that focus on broader principles of respect, inclusion, wellbeing, and responsiveness in order to reduce the risk that anti-racism efforts become tokenistic or compliance driven, and to ensure coherence with and alignment to related themes in disability inclusion and universal design. Therefore, to address racism, universities and other HE providers should be required to demonstrate commitment through clear, accessible policies that address racism, discrimination, and inclusion across student and staff experience. It is also important to integrate anti racism expectations into codes of conduct, student safety and wellbeing policies, complaints and grievance systems, curriculum design, recruitment, promotions, and leadership development.

Council and executive level oversight, supported by structured reporting on incidents, trends, and institutional responses, should be strengthened to ensure expectations are implemented in practice and with the intended outcomes for all members of the university community. Governance bodies should also be expected to complete regular institutional self-reviews of systemic barriers, including policy environments, staffing diversity, learning spaces, and cultural capability. It is also clear from the recent AHRC report that key elements of efforts to combat racism are trusted, transparent, timely complaints processes that minimise fear of retaliation and encourage reporting, which is one of the areas where governance bodies play a key role in oversight and improvement.

### 1.2 What targeted guidance would most effectively support providers to meet strengthened anti-racism expectations?

**Recommendation 2:** UniSC recommends the provision of clear, practical guidance on how existing standards can be applied to address racism, supported by good practice examples, community-informed approaches, culturally safe reporting mechanisms, and alignment with external frameworks such as anti-discrimination and human rights obligations.

UniSC would welcome guidance that clarifies how existing standards, particularly those on student safety (2.3.4), wellbeing (6.1.4), governance (6.2.1(a)), equity, and complaints handling, can be interpreted to address racism. Guidance could provide good practice examples, including community informed approaches and culturally safe reporting mechanisms. Use could be made of tools like TEQSA's AI action plan support materials that align with external frameworks such as anti-discrimination law and human rights obligations.

1.3 What are the principal benefits and potential limitations of explicit antiracism standards compared with reliance on existing wellbeing, equity and governance provisions?

**Recommendation 3:** UniSC recommends strengthening expectations within existing standards as the best way to produce the most integrated, proportionate and sustainable approach to addressing the persistence of racism within Australian HE.

Due to significant societal concerns and evidence regarding the prevalence of racism in Australian HE, it could be that explicit antiracism standards are required because these provide signals regarding national commitment, enhance visibility, and strengthen TEQSA's regulatory oversight in this area. The use of standards also encourages consistency of institutional approach across Higher Education providers. Nevertheless, we also see potential limitations in that there are risks of duplication with existing legislative and regulatory obligations. This approach may also produce compliance oriented or symbolic responses rather than authentic cultural change and could reduce institutional flexibility to tailor initiatives to local contexts, communities, and resourcing. Therefore, UniSC believes that strengthening expectations within existing standards is likely to produce the most integrated, proportionate and sustainable approach to addressing the persistence of racism within Australian HE.

## 2. Incorporating the governance principles and transparency requirements

2.1 If a new Part C is created to incorporate the University Governance Principles, what are the advantages and risks of having some standards apply only to 'public universities'?

**Recommendation 4:** UniSC recommends a universal, principles-based approach to promote clarity and equity across the sector.

UniSC strongly asserts that the integrity and reputation of Australia's higher education sector rely on consistent governance expectations. Applying governance principles solely to public universities risks fragmentation within the sector and regulatory asymmetry. It potentially leads to confusion amongst stakeholders, especially students, regarding sector wide accountability and transparency expectations. It would also seem to suggest a significant divergence from the vision of an integrated tertiary education system under the Australian Tertiary Education Commission (ATEC) reforms. Therefore, UniSC's position is that a universal, principles-based approach (demonstrated proportionately based on provider type, size, scale, and risk) would promote clarity and equity across the sector.

2.2 How might strengthened standards on academic oversight, staffing profiles, and teaching quality affect student outcomes and experience?

**Recommendation 5:** UniSC recommends that a principle-based approach remains essential for effectiveness and proportionality of the HESF.

Strengthened standards may positively influence student outcomes when they clarify academic governance roles and responsibilities, ensure staffing levels and capability are sufficient for high quality learning and assessment, and reinforce academic integrity and transparent quality assurance. However, strengthened requirements must avoid conflating governance with operational management. It is also crucial that standards recognise institutional diversity of mission, purpose, and scale, and avoid consequences for smaller institutions should administrative burden divert resources from learning, teaching, and student support. Therefore, a principle-based approach remains essential for effectiveness and proportionality of the HESF.

### 3. Supporting people with disability in Higher Education

- 3.1 To what extent would the proposed themes in the consultation paper (inclusion, universal design and inherent requirements) drive a more inclusive and equitable higher education system and drive student outcomes?

**Recommendation 6:** UniSC recommends embedding universal design across curriculum, digital systems, assessments, physical environments, and administrative processes, to reduce the need for individual adjustments and improve outcomes for all students. A whole of institution approach will benefit both students and staff, reflecting diverse capabilities and strengthening workforce participation.

The proposed themes of inclusion, universal design, and inherent requirements have strong potential to create more equitable and accessible higher education environments. UniSC's extensive experience in supporting a diverse student body, including a significant proportion of students with a declared disability, convinces us that embedding universal design across curriculum, digital systems, assessments, physical environments, and administrative processes reduces the need for individual adjustments and improves outcomes for all students.

The standards potentially play a vital role in ensuring that clear and consistently applied inherent requirements support transparency and informed choice when implemented as tools for inclusion rather than exclusion. A whole of institution approach will benefit both students and staff, reflecting diverse capabilities and strengthening workforce participation. We note that these themes also closely intersect with anti-racism, wellbeing, and equity frameworks, which means that any revisions to the standards must be holistically applied to avoid sending mixed messages to stakeholders, particularly students. This is crucial given the fact that these issues are intersectional and many students cannot be simplistically identified according to a single characteristic.

- 3.2 To what extent would the proposed themes promote accountability, better governance and improved provider practice to support people with disability in higher education?

**Recommendation 7:** UniSC recommends embedding inclusive practice into campus and infrastructure design, recruitment, retention, professional learning, and organisational culture.

UniSC is strongly supportive of a principles-based approach that ensures flexibility while reinforcing obligations under the Disability Discrimination Act and Disability Standards for Education. Strengthened inclusivity obligations that address community expectations potentially enable improved support through elevated leadership accountability, but only if these are enabled within universities' academic and corporate governance frameworks. These frameworks should support effective monitoring and continuous improvement using data, feedback, and lived experience informed evaluation. An area that UniSC believes needs particular attention is understanding of responsibilities for work integrated learning (WIL), third party delivery, fieldwork, and laboratory environments, because these can be areas of work involving elevated risk of non-compliance and poor student experience. Avoiding these problems can be achieved if universities embed inclusive practice into campus and infrastructure design, recruitment, retention, professional learning, and organisational culture.

### 4. Responding to emerging technologies in the Threshold Standards

- 4.1 Does the term 'emerging technologies' adequately capture the range of innovations and digital technologies that are transforming higher education? If not, please suggest alternative terminology.

**Recommendation 8:** UniSC recommends that an alternative such as "emerging digital and educational technologies" may more accurately reflect sector use and purpose.

UniSC believes the term is broadly appropriate, capturing a wide span of innovations. However, its emphasis has become strongly associated with AI and may not sufficiently capture educational technologies that support learning, business operations, data analytics, or cloud-based systems. An alternative such as “emerging digital and educational technologies” may more accurately reflect sector use and purpose.

#### 4.2 Do the standards currently provide adequate guidance to manage risks related to emerging technologies?

**Recommendation 9:** UniSC recommends that the focus of attention should be on clarifying that emerging technologies fall within existing governance and risk frameworks to ensure consistent interpretation of how the use of these technologies may impact on students’ learning and the conduct of research.

UniSC’s experience is that existing principle-based standards provide substantial foundations for managing risks, particularly through the way they set clear expectations for governance, academic integrity, equity, and risk management. Therefore, additional regulatory requirements may not be necessary. Instead, the focus of attention should be on clarifying that emerging technologies fall within existing governance and risk frameworks to ensure consistent interpretation of how the use of these technologies may impact on students’ learning and the conduct of research. Sector wide guidance on how best to manage these impacts and how to achieve excellent outcomes in education and research (e.g., case studies, advice notes, practical frameworks) would be more effective and less burdensome than new prescriptive standards.

#### 4.3 How should amended standards appropriately balance the management of risks with the need to preserve provider flexibility so as to support ongoing innovation?

**Recommendation 10:** UniSC recommends that amendments should remain technology-agnostic and focus on issues related to impacts on students’ learning, equity, and ethical use, as well as the impacts of technology on academic integrity, data management, and governance accountability.

It is important that standards are not overly concerned with technologies that might be rapidly superseded during a time of significant change. There is a risk that standards could become obsolete very quickly and the need for frequent updating should be avoided. Therefore, amendments should remain technology-agnostic and focus on issues related to impacts on students’ learning, equity, and ethical use. Additional areas of focus for standards are the impacts of technology on academic integrity, data management, and governance accountability. The standards should not inhibit the ability of universities to demonstrate institutional flexibility, enabling innovation, proof of concept trials, and rapid adoption cycles for new technologies. UniSC believes that avoiding overly prescriptive compliance requirements preserves innovation while ensuring governance bodies maintain robust oversight of the impacts of technology on education and research activities.

## 5. Approach to a cyclical review of the Threshold Standards

#### 5.1 What methodological approaches should underpin a cyclical review of the Threshold Standards to ensure it is robust, proportionate and evidence-informed?

**Recommendation 11:** UniSC recommends that the review of the standards be structured and evidence informed, mapping issues against existing standards, guidance, legislation, and regulatory practice, and that reviews should be conducted using mixed methodologies.

Reviews should be conducted with clear scope, timelines, evaluation criteria, and decision-making principles to enhance transparency and predictability for the sector. Ideally, reviews should be conducted using mixed methodologies, including sector submissions, data analysis, comparative international frameworks, surveys, focus groups, and workshops, to ensure decisions to change the standards are based on rigorous evidence. Complementing the formal reviews, there should be

adaptive mechanisms between cycles (for example, issue-based reviews, Statements of Regulatory Expectation, targeted amendments).

#### 5.2 How can a review process be designed to meaningfully engage a diverse range of stakeholders?

**Recommendation 12:** UniSC recommends that consultation occur across multiple stages of the review cycle and include transparency regarding how feedback is considered and applied.

UniSC's experience suggests that effective engagement requires consultation across multiple stages of the review cycle; not only after proposals are drafted. Principles of inclusive design that enable contributions from underrepresented groups, including students and staff with disability, First Nations communities, and culturally diverse stakeholders should be developed and followed for all reviews. These principles should also include transparency regarding how feedback is considered and applied with potential use of co design processes and reference groups to ensure they reflect the diversity of the higher education ecosystem.