



Submission from the Australian Council of Deans of Science (ACDS):

Consultation on amendments to the Higher Education Standards Framework (Threshold Standards) 2021

Key Messages

- **Governance:** Clearer expectations for academic oversight would strengthen the consistency and effectiveness of governance arrangements across universities.
- **Racism and cultural safety:** The Standards should more clearly articulate institutional responsibilities for addressing racism and supporting culturally safe learning environments, including explicit recognition of First Nations peoples and knowledge systems.
- **Disability and accessibility:** Accessibility should increasingly be embedded within course design through universal design approaches rather than relying primarily on individual adjustments.
- **Emerging technologies:** Regulatory approaches to technologies such as artificial intelligence should balance risk management with the need for innovation in teaching, learning and assessment.
- **Review of the Standards:** Regular cyclical review of the Standards would help ensure the framework remains relevant, proportionate and aligned with developments in higher education.

Introduction

The Australian Council of Deans of Science (ACDS) represents the leaders of science faculties, colleges and schools across Australian universities – we are the voice of university science.

Our members oversee education and research across a wide range of disciplines, including laboratory sciences, field sciences, computational sciences and interdisciplinary STEM programs.

University science education frequently occurs in distinctive learning environments such as laboratories, fieldwork settings and work-integrated learning placements. These contexts create particular responsibilities for universities to ensure safety, professionalism, inclusion and academic integrity. Regulatory frameworks must therefore be clear, proportionate and adaptable to the realities of science education and practice, which often involve different risks, expectations and modes of delivery compared with many other disciplines. The distinctive characteristics of university science inform the perspective ACDS brings to this submission.

ACDS welcomes the opportunity to contribute to the consultation on amendments to the Higher Education Standards Framework (Threshold Standards). It is essential that any amendments maintain the principle-based nature of the framework while providing clearer expectations in areas where institutional practice currently varies.

This submission is structured around the major thematic areas identified in the consultation paper. While the paper poses specific consultation questions under each theme, our response focuses on the broader policy issues raised within those themes rather than addressing every question individually. Given the timeframe available for consultation and the need to draw together perspectives across member institutions, this approach allows ACDS to provide a concise response reflecting the experience of university science across the sector.

1. Demonstrating a commitment to addressing racism

(Issues addressed: Consultation Questions 1–3)

The Threshold Standards should clearly articulate institutional responsibilities for addressing racism and ensuring culturally safe learning environments.

ACDS supports strengthening expectations relating to racism within the Standards. Clearer articulation of institutional responsibilities would support greater consistency across the sector and reinforce expectations regarding safe and inclusive learning environments.

ACDS also emphasises the particular importance of recognising the distinct status and priorities of First Nations peoples. Explicit recognition of First Nations perspectives is particularly important in science education, where Indigenous knowledge contributes to scientific understanding and where culturally safe environments are essential for student participation and success.

Science education settings provide opportunities to model respectful professional behaviour. Laboratories, fieldwork environments and collaborative learning activities are central components of many science programs and help prepare students for professional workplace cultures.

While recognising that institutional responsibilities to address racism can be articulated across various standards, having a separate Standard specifically to address this issue will add clarity and send a strong message for the future of higher education.

ACDS recommends that strengthened standards explicitly recognise the distinct status and perspectives of First Nations peoples and establish clear institutional expectations, while maintaining flexibility for universities to demonstrate culturally safe environments across diverse teaching contexts. In doing so, the Standards should also recognise that racism can intersect with other forms of disadvantage — including gender, socioeconomic background and health-related inequities — resulting in compounding impacts for both staff and students. The ACDS supports the articulation of clear expectations to address racism in a separate Standard.

2. Incorporating University Governance Principles and transparency requirements

(Issues addressed: Consultation Questions 4–5)

Clearer expectations for academic oversight would strengthen the effectiveness and consistency of governance across universities.

ACDS members report variation across institutions in how governance responsibilities are interpreted and implemented, particularly across course, school, faculty and institutional levels. While governance structures can generally be demonstrated, their effectiveness and consistency vary across the sector.

Academic governance is typically strong within academic boards and faculty committees. However, the influence of academic perspectives within university governing bodies and councils can be less visible, particularly where formal academic representation at this highest level is limited. Strengthening the academic voice within institutional governance arrangements would improve alignment between academic priorities, educational quality and institutional decision-making.

ACDS strongly supports appropriate transparency in governance and decision-making. Greater transparency can strengthen accountability and trust within institutions and across the sector. However, additional reporting requirements should be designed carefully to ensure they improve governance outcomes rather than simply increase compliance burdens. The effectiveness of the governance and transparency requirements need to be measured from the perspective of all people in an institution, including students and academic, professional and technical staff.

ACDS recommends that strengthened governance expectations focus on the effectiveness of academic oversight and the visibility of academic input into institutional decision-making, rather than primarily expanding reporting requirements.

3. Supporting People with Disability in Higher Education

(Issues addressed: Consultation Questions 6–7)

Accessibility should increasingly be embedded within course design rather than relying primarily on individual adjustments.

ACDS supports the consultation themes of inclusion, universal design and inherent requirements as mechanisms for improving outcomes for students with disability.

Science programs frequently involve laboratories, fieldwork and work-integrated learning placements. These contexts require careful application of accessibility principles to ensure both inclusion and academic integrity are maintained.

ACDS considers that the concept of inherent requirements should be clearly defined and periodically reviewed to ensure they remain evidence-based and aligned with intended learning outcomes. Expectations historically treated as inherent requirements may sometimes reflect legacy assumptions (including about vocational outcomes) rather than genuine educational requirements.

ACDS supports the framing of accessibility as “accessibility for all”. Universal design approaches can reduce systemic barriers and improve the learning experience for all students.

Institutions serving larger cohorts of students from low-socioeconomic backgrounds may experience higher demand for accessibility support. While funding and broader system-level policy settings sit beyond the scope of the Threshold Standards themselves, it is important that regulatory expectations recognise the practical resource implications associated with delivering accessible learning environments.

ACDS supports the framing of accessibility as “accessibility for all”. Universal design approaches can reduce systemic barriers and improve learning experience for all students.

4. Responding to emerging technologies in the Threshold Standards

(Issues addressed: Consultation Questions 8–10)

Regulatory approaches to emerging technologies should balance risk management with the need for innovation in teaching and learning.

The ACDS supports the use of the term ‘emerging technologies’. Artificial intelligence (AI) and related technologies are rapidly reshaping learning and teaching, scientific research and professional practice. Universities therefore have a critical role in preparing students to use these technologies responsibly and effectively.

Students must develop capabilities in areas such as ethical technology use (particularly AI), data governance, intellectual property awareness and critical evaluation of technology-generated outputs. Many academic integrity concerns arise from uncertainty rather than deliberate misconduct, highlighting the importance of clear institutional guidance. Universities also have an educational and societal responsibility to equip graduates to enter a world of rapid technological change, and to ensure they are confident in applying emerging technologies responsibly and ethically.

ACDS recommends that the Standards emphasise institutional governance and capability development in relation to emerging technologies, rather than prescriptive controls that could limit innovation in teaching and assessment.

5. Approach to a cyclical review of the Threshold Standards

(Issues addressed: Consultation Questions 11–12)

Regular cyclical review will help ensure the Standards remain relevant and proportionate in a rapidly evolving higher education environment.

ACDS supports the proposal to introduce a regular cyclical review of the Threshold Standards. Higher education is evolving rapidly in response to technological change, new educational models and shifting workforce expectations, and periodic review is therefore important to ensure the framework remains fit for purpose.

We urge that review processes should clearly define what is being assessed and the outcomes they seek to achieve. Methodological approaches to review should therefore include clear success metrics — such as graduate outcomes, improvements in accessibility, or evidence of strengthened governance practices — and draw on both leading and lagging indicators to assess the impact of the Standards.

Cyclical review should also provide an opportunity to prevent unnecessary regulatory accumulation and ensure the framework remains aligned with broader developments across the higher education sector. Reviews should consider lessons from comparable international higher education systems and other regulatory contexts, and provide a structured opportunity to streamline or sunset elements of the framework where they no longer contribute to improved educational outcomes. Meaningful engagement with sector stakeholders, including disciplinary bodies such as ACDS, will be important in ensuring reviews reflect institutional practice and experience. Bodies such as ACDS can provide discipline-informed insight into how the Standards operate in practice across diverse teaching and learning environments.

ACDS recommends that cyclical reviews be designed around clearly defined outcomes and success metrics to assess impact, and include explicit mechanisms to streamline, sunset or remove elements of the framework that are not demonstrably improving educational quality or student outcomes.

Conclusion

ACDS welcomes the opportunity to contribute to this consultation and recognises the importance of ensuring that the Higher Education Standards Framework remains contemporary, effective and proportionate.

From the perspective of university science faculties, the Standards support high-quality teaching, robust governance and inclusive learning environments. At the same time, the framework must retain flexibility to accommodate diverse disciplinary contexts and rapidly evolving technological environments.

As the Standards evolve, it will be important to ensure that strengthened regulatory expectations support genuine improvements in teaching and learning without unintentionally increasing administrative burden. Universities should be able to focus effort on strengthening educational practice — such as embedding universal design for learning and building cultural capability — rather than primarily producing additional reports or compliance documentation. Regulatory expectations should therefore remain proportionate and focused on demonstrable educational outcomes.

ACDS looks forward to continuing to engage constructively with government, regulators and the sector to ensure the Threshold Standards support excellence, integrity and innovation across Australian higher education.