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Mr Jesse Gardner-Russell
National President

Higher Education Standards Panel

Consultation on amendments to the Higher Education Standards Framework
By email: HESFconsultation@atec.gov.au

Dear Higher Education Standards Panel,

Consultation on amendments to the Higher Education Standards Framework

The Council of Australian Postgraduate Associations (CAPA), welcomes the opportunity to contribute to the consultation on Consultation on amendments to the Higher Education Standards Framework. CAPA is the peak representative body for over 570,000 postgraduate students in Australia, masters by coursework and higher degree by research students. CAPA has previously provided recommendations regarding the Higher Education Standards, in our submission to the [Senate Education and Employment Committee](#), and on [strengthening the powers of TEQSA](#).

CAPA believes that robust review of the Higher Education Threshold Standards is critical to ensuring that the higher education sector is delivering for postgraduate students. Notably, equity groups, who have long been underrepresented in universities, require the requisite safeguards in university regulation to ensure that they are able to succeed and achieve excellence.

CAPA thanks the following National Office Bearers and Board Directors for their input: Maxim Buckley, CAPA Research Officer, Alexander Tofler, CAPA Disability Officer and Gemma Lucy Smart, CAPA Board Chair.

We thank the panel for the opportunity to make this submission. If CAPA can be of any support, please do not hesitate to contact us at president@capa.edu.au.

Regards,

A handwritten signature in black ink that reads 'J Gardner-Russell'. The signature is fluid and cursive, with a long, sweeping underline that extends to the left.

Mr Jesse Gardner-Russell
National President

Demonstrating a commitment to addressing racism

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

CAPA believes that a principles based approach would best demonstrate institution wide commitment to addressing racism. Research conducted by the Australian National University's Centre for Social Policy Research, on which the *Racism@Uni* report is based, indicates that university ranks as the sixth most common setting in which university students experience racism. The POLIS technical report reveals that 25.8% of international students and 24.0% of domestic students believe racism is a problem at their institution. Noting biases in census style studies, racism undermines the conditions necessary for equitable participation in higher education. CAPA holds that universities should maintain a zero-tolerance position on racism and that this commitment must be operationalised based on the different ways students of different study levels experience racism.

The particular vulnerability of higher degree by research candidates

Any institution-wide framework must give particular attention to higher degree by research (HDR) candidates, who are disproportionately represented in the data. HDR students comprise approximately 4% of the total university student population, yet accounted for 10% of respondents in the POLIS survey. This is a pattern that cannot be attributed to sampling variation alone and signals elevated exposure or heightened awareness of racism within this cohort.

The POLIS technical report also establishes that increasing age is associated with increased reporting of racism for both domestic and international students. This finding is directly relevant to HDR candidates: the average doctoral student is in their mid-thirties, and postgraduate cohorts are, significantly older than the undergraduate population. Age and study level therefore operate together to concentrate racism risk among HDR students.

Structural risk in postgraduate and research settings

HDR candidates occupy a distinctive institutional position as both students and, in many cases, workers. They navigate a range of relationships that carry no equivalent in the undergraduate experience. Most critically, supervisory relationships and, where applicable, placements with external providers. These relationships are characterised by pronounced power asymmetry. A candidate's academic progression, funding, publication record, and professional reputation are often substantially dependent on a single supervisor, creating conditions in which racism — whether overt or expressed through differential treatment and resourcing — may be difficult to identify, document, or contest.

The tightly bounded nature of many research fields compounds this vulnerability. HDR candidates frequently operate within small disciplinary communities where supervisors, assessors, and future employers are known to one another. In this environment, the perceived professional cost of raising a complaint can be prohibitive, and candidates may elect to endure discriminatory treatment rather than risk damage to their standing in a field they have invested years in entering.

CAPA's recommendations for required institutional action

CAPA recommends that higher education providers be required to take the following specific actions to demonstrate a clear, institution-wide commitment to addressing racism:

- **Zero-tolerance policy with institutional accountability:** Providers should adopt an explicit zero-tolerance position on racism, supported by transparent reporting on complaints received, outcomes, and systemic trend, which clearly articulates improvements based on level of study.
- **Amendment of research training frameworks:** Universities should be required to amend their research training policies to incorporate explicit principles addressing racism in the supervisory relationship, including clear articulation of candidate entitlements, standards of equitable treatment, and direct recourse mechanisms available to HDR students without risk to their candidature.
- **Dedicated HDR safeguards:** Given the dual student-worker status of many HDR candidates and the structural power imbalances inherent in research training environments, additional protective mechanisms should be mandated — including access to independent advocates, confidential reporting pathways, and the option to seek supervisory reassignment where a complaint of racism has been made.
- **Disaggregated data collection and reporting:** Institutions should be required to collect and report data on racism experiences in a manner that captures variation by citizenship status, study level, discipline, age, and other relevant characteristics. Aggregate reporting obscures the concentrated nature of racism risk and impedes targeted institutional response.

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

Demographic context: study level and age

International and domestic students present markedly different study-level and age profiles, with direct consequences for where and how anti-racism guidance should be directed. Among domestic respondents, 70.9% were undergraduates, compared with just 23.0% of international students. This pattern reverses at the postgraduate level: 43.2% of international students were enrolled in master's programs, against 12.1% of domestic students, and 16.8% of international students were undertaking doctoral study compared with 6.2% of domestic students.

These differences are mirrored in age distributions. Domestic students were more likely to be aged 21 or younger (43.9%), while only 23.2% of international students fell within this age group. Conversely, 41.9% of international students were aged 25–34, compared with 17.5% of domestic students. International students are therefore disproportionately concentrated in older, postgraduate cohorts, a demographic profile that shapes both the settings in which racism is experienced and the institutional mechanisms best placed to address it.

Guidance for coursework environments

The *Racism@Uni* report demonstrates that, for coursework students, the majority of university-based racism occurs in small classroom and peer settings. This finding has clear implications for institutional design. Providers should be encouraged to embed social cohesion and intercultural competency programs into the early stages of the student experience, particularly at induction and orientation, to establish shared norms of respect and inclusion before students enter classroom environments. Such programs should not be framed as remedial or directed at particular cohorts, but as a universal foundation for learning communities that reflect Australia's cultural diversity. Guidance to providers should specify that these programs be evidence-based, regularly evaluated, and integrated into curriculum design rather than delivered as standalone compliance exercises.

Targeted guidance for higher degree by research candidates

The overrepresentation of international students in higher degree by research (HDR) programs warrants dedicated guidance for the research training environment, which operates under fundamentally different conditions from coursework study. The supervisory relationship is characterised by significant power asymmetry: candidates are dependent on their supervisors for academic progression, funding, publication opportunities, and professional networks. This structural dynamic creates conditions in which racism may manifest not as overt conduct, but as differential resourcing — for instance, the preferential allocation of support, feedback, or opportunities to candidates on the basis of race or national origin.

Targeted guidance for HDR programs should address the following:

- **Transparent articulation of entitlements:** TEQSA Research training guidance should clearly set out the resources, supervision hours, feedback standards, and support mechanisms to which all HDR candidates are entitled, irrespective of background. Codifying these entitlements reduces the scope for inequitable treatment to go unrecognised or uncontested.
- **Power dynamics and candidate agency:** Guidance should require that induction materials and supervisory agreements explicitly acknowledge the power differential inherent in the supervisory relationship and identify the mechanisms through which candidates can raise concerns without risk to their candidature. This includes clearly communicated access to alternative supervisors, ombudspersons, and grievance pathways.
- **Supervisor accountability:** Institutions should be guided to incorporate equity and inclusion considerations into supervisor training and performance review processes, ensuring that differential treatment of candidates is subject to institutional scrutiny rather than remaining invisible within the supervisory system.
- **Peer and cohort dynamics:** Guidance should also address the collegial dimensions of HDR study, including access to research groups, seminars, and informal professional networks, where perceived exclusion on the basis of race or national origin may compound the effects of supervisory inequity.

3. *What are the principal benefits and potential limitations of explicit anti-racism standards compared with reliance on existing wellbeing, equity and governance provisions?*

Intersectional patterns in the prevalence of racism

Data from the POLIS technical document demonstrate that experiences of racism in higher education are neither uniform nor evenly distributed. Rather, they are shaped by the intersection of gender, citizenship status, study level, field of discipline, and sexual orientation — a finding with direct implications for the design of any anti-racism standard.

Gender and citizenship status

Among domestic students, women report lower rates of racism than men across all study levels, with the exception of the doctorate, where rates converge (15.0% for women; 14.8% for men). This pattern inverts for international students: women report substantially higher rates of racism than men at every level of study. The disparity is most pronounced at the doctoral level (23.4% for women compared with 14.7% for men) and at the degree level (23.2% compared with 16.8%). These divergences suggest that gender operates differently as a risk factor depending on citizenship status, and that interventions calibrated only to one cohort may inadequately serve the other.

Field of study

Discipline is also a material determinant of experience. Education consistently records the lowest rates of racism across all student groups. Management and commerce show low rates for domestic women and international students, though domestic men report slightly above-average levels in that field. Architecture and building, by contrast, records some of the highest rates for both domestic and international students. Health also ranks among the highest-risk fields, particularly for domestic men and women, and records the highest rate of racism for international women. These patterns indicate that exposure to racism is concentrated in particular disciplinary environments, warranting field-specific attention rather than sector-wide uniform responses.

Sexual orientation

Sexual orientation is a further significant correlate of reported racism. Students identifying as gay, queer or lesbian experience rates of racism 8.9 percentage points higher than heterosexual students; those identifying as bisexual or pansexual report rates 6.1 percentage points higher. All observed differences are statistically significant. Among domestic students, the sole statistically significant finding at the 95% confidence level was a modest 2.2 percentage point reduction in reported racism among students identifying as demisexual or asexual — suggesting that, within domestic cohorts, sexual orientation is a less consistent predictor of racism exposure than it is across the broader student population.

Implications for standard design

Taken together, these findings caution against a uniform, sector-wide approach to anti-racism. Racism in Australian higher education is intersectional: for non-doctoral domestic students it is experienced disproportionately by men; for international students, disproportionately by women. Study level, age, discipline and sexual identity each modulate

the likelihood and nature of exposure. An anti-racism standard that does not account for this complexity risks misallocating institutional effort, overlooking the most affected cohorts, and generating compliance responses that are broad in form but limited in practical effect. Effective anti-racism guidance should be differentiated by study level, disciplinary context and intersectional student characteristics — enabling institutions to direct resources and interventions where the evidence indicates they are most needed.

Incorporating the University Governance Principles and transparency requirements

4. 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'?

The existing precedent for differentiated standards

CAPA supports the creation of a Part C applying specifically to public universities, and notes that a precedent for differentiated regulatory requirements already exists within the Threshold Standards framework. TEQSA has articulated that the undertaking of research leading to new knowledge and original creative endeavour, together with research training, represents a fundamental and defining feature of any higher education provider seeking status as an Australian University. Research activity is therefore not merely incidental to university status, rather it is constitutive of it. This foundational distinction justifies a separate and more demanding tier of governance standards, calibrated to the unique operational complexity, public accountability obligations, and research missions of public universities.

Public universities also occupy a distinct position in the national higher education landscape by virtue of their receipt of substantial Commonwealth funding, their role as custodians of public resources, and the scale and diversity of their student and staff communities. As CAPA has argued across multiple submissions, the Commonwealth has become the principal financial provider for all universities — a reality that creates accountability obligations which do not apply with equal force to private or specialist providers, and which warrant governance standards commensurate with that public trust.

Advantages of a Part C applying to public universities

The creation of a dedicated Part C carries several significant advantages. First, it would provide regulatory clarity — removing ambiguity about the governance expectations that apply to public universities specifically, and enabling TEQSA to assess compliance against defined, enforceable standards rather than relying on the implicit coverage of general provisions. The Expert Council's conclusion that trust in public universities has eroded, and that a self-regulating approach is no longer appropriate, reinforces the case for explicit, externally monitored requirements. CAPA's submission to the ECUG (April 2025) and its Joint Reform Proposal with the NTEU and NUS for the Victorian Legislative Assembly inquiry (March 2026) both called for TEQSA to be granted expanded powers to embed the ECUG Principles into the Threshold Standards, specify a national 'if not, why not' reporting model, and require remediation where insufficient justification is provided. Part C is the appropriate vehicle for these powers.

Second, differentiated standards allow governance requirements to be proportionate to institutional complexity and public mission. The governance challenges facing a large public research university are qualitatively different from those facing smaller or more narrowly scoped providers. A standards tier calibrated to that complexity is more likely to produce effective outcomes than a one-size-fits-all approach.

Third, data on the composition of governing bodies across Australian universities illustrates the structural gaps that Part C must address. As CAPA has documented across multiple submissions, Victorian public universities have significantly lower levels of staff and student representation than their NSW counterparts, with no Victorian university currently including a dedicated postgraduate student representative on its governing body. Analysis of academic governing bodies further reveals that the Group of Eight universities — which have an average academic board size of 199 members — consistently outperform other institutions in research and educational rankings, compared to a Victorian average of 40 members and an NSW non-Go8 average of 45. The correlation between broader internal representation and institutional performance is not incidental; it reflects the contribution of diverse, community-grounded perspectives to strategic decision-making.

Risks and limitations

CAPA acknowledges that differential standards carry risks that should be addressed in the design of Part C. The principal risk is definitional instability — that a two-tier structure may create incentives for providers to resist reclassification, or to exploit definitional boundaries to avoid more demanding requirements. Clear and stable definitions anchored to the Australian Universities category and Table A universities as specified in the *Higher Education Support Act 2003* would mitigate this risk.

A further risk is that standards applying only to public universities may inadvertently signal lower governance expectations for private providers. CAPA recommends the HESP consider whether core elements of Part C — particularly those relating to student participation and transparency — could be adapted for broader sector application, even if the formal obligations of Part C remain confined to public universities.

CAPA also cautions against the perpetuation of a culture of 'consent by silence' in university governance structures. CAPA's consultation with members across multiple jurisdictions has consistently identified that decisions on governing bodies are reached not through formal deliberation and voted consensus, but through the absence of dissent — a dynamic that systematically marginalises student and early-career academic voices and that Part C should be designed to explicitly disrupt. Governing process requirements, not only compositional requirements, must therefore form part of any strengthened standard.

CAPA recommends the following specific amendments and inclusions in Part C:

- **Independent audit powers for TEQSA:** Section 6.1(d) of the Higher Education Standards Framework should be amended to confer on TEQSA the power to independently audit, or to appoint an independent auditor to review, the effectiveness of the governing bodies of Australian universities. Independent audit capability is an essential enforcement backstop given the demonstrated inadequacy of self-reporting mechanisms.

- **Mandated student representation disaggregated by cohort:** Section 6.1 should be amended to require meaningful student participation in all university corporate governance structures, with specific provision for elected undergraduate, postgraduate coursework, and HDR representatives as distinct constituencies. Collapsing these cohorts into a single student representative seat systematically excludes the voices of postgraduate and research students, who are the most directly affected by the governance risks that Part C is designed to address. CAPA further recommends that elected student terms be extended to two years to enable meaningful institutional continuity, and that universities provide structured induction, governance training, and ongoing support to student representatives to ensure they can participate as genuine partners rather than tokenistic additions.
- **Democratically elected majority from the university community:** The majority of university governing body membership should comprise the university community through democratically elected staff, students, and alumni. Elected staff representatives should constitute no less than 20% of governing body membership. Governing bodies should also include Aboriginal and Torres Strait Islander representation. These requirements reflect CAPA's consistent position across its ECUG submission, Victorian inquiry submission, and this consultation, and are supported by the Joint Declaration of University Student and Staff Voice endorsed by CAPA, the NTEU, the NUS, and a broad coalition of student and civil society organisations.
- **A students-as-partners framework:** Part C should include a national framework for how universities work with students as partners in both corporate and academic governance — moving beyond consultation at the lower end of the engagement spectrum toward genuine co-governance. Council charters should enable student members to consult with the broader student community on matters before the governing body, addressing the structural isolation that currently prevents elected representatives from functioning as genuine community voices.
- **Transparent and publicly accountable financial governance:** All non-commercial items discussed at governing body meetings should be publicly available, and quarterly financial reports should be published. Executive remuneration should be reported publicly, benchmarked against public sector entities of comparable complexity, and — consistent with CAPA's earlier submission to the ECUG — subject to appropriate caps relative to the salaries of relevant state premiers or equivalent public office-holders.

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

The structural relationship between governance, staffing, and outcomes

As outlined in CAPA's [submission](#) to the Senate Education and Employment Committee, strengthened academic oversight and staffing standards will only produce meaningful improvements in student outcomes if they are designed to reflect the full diversity of the student population and the institutional environments in which learning and research occur.

Standards that improve performance without tackling the structural inequities that concentrate disadvantage in particular cohorts risk improving headline metrics while leaving the most vulnerable students behind.

The data on staffing profiles is instructive in this regard. The average student-to-staff ratio among the world's top 100 ranked universities is 5.22 students per academic staff member; among Australian public universities it is 30.5 to 1 — six times higher. A significant and growing proportion of university teaching is delivered by casual staff rather than continuing academics, a workforce model that undermines both teaching quality and the continuity of student support. Strengthened staffing standards must therefore address not only the quantum of academic staff but the conditions of their employment, as casualisation directly erodes the capacity of staff to invest in student relationships, curriculum development, and the kind of sustained mentorship that postgraduate and research students in particular depend upon.

Increased governing body independence, the dominant structural trend in Australian universities since the Dawkins reforms, is associated with reduced impact on both research and teaching performance. By contrast, greater participation of internal university community members in governing committees improves both research and financial outcomes. Strengthened academic oversight standards should therefore not be conceived narrowly as a matter of curriculum review and quality assurance, but as part of a broader reorientation of governance away from top-down efficiency models toward structures that embed academic expertise and student voice in institutional decision-making.

Supporting people with disability in higher education

6. 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 improved student outcomes?

First person and third person language (person/student with disability, and, disabled person/student) will be used interchangeably in these sections.

The term disability, and its use in the term of students with disability, must be understood as an evolving concept, Dr Inger Marie Lid says, “it is temporarily situated and context sensitive.” ‘Disability’ arises from the interaction between persons with *impairments* and the attitudinal and environmental barriers, therefore it follows that to improve outcomes for students with disabilities, it must be understood how disability is temporarily situated within higher education, and how contextual factors at play impact ‘disability’ for both students and staff. The three proposed themes identified are crucially important to eradicate the attitudinal and environmental barriers which result in the poorer outcomes and inconsistent support experienced by students and staff with disability. Specific attention is required to the post-graduate and Higher Degree by Research (HDR) contexts, which embed structural obligations into systems rather than unenforceable vague statements of principle.

CAPA recommends specific considerations for the proposed themes:

- **Nomenclature and terminology:** CAPA agrees with the consultation paper note on terminology requiring to adhere to the principle of universal application and design. To undo the wide-ranging detrimental impacts and eradicate the attitudinal barriers is

a colossal task, which is evermore necessary for educational institutions to lead, as education is a key access point to disabled persons and citizens, and their ability to participate in democratic processes, a fundamental aspect of human rights.

- **Inclusion:** A whole-of-institution provider duty is imperative to promoting *inclusion* for students with disability. CAPA's 2025 Disability Standards submission stresses that inclusion must extend to areas that are often invisible in general higher education policy, especially supervisory relationships, research progression, candidature management, fieldwork, placements and professional development. In the submission it was uncovered that postgraduate students with disability face unique risks because supervisory relationships are highly concentrated sites of power and are often poorly regulated. Intersectionality, the experience of holding multiple intersecting or overlapping identities which materialise in various forms of diverse compounded forms of discrimination and disadvantage. Gendered experiences of disability, increases the risks of vulnerability, and rates of gender-based violence, sexual violence and other material academic impacts. Bureaucratic disablement is highly prevalent, which further heightens the students' disadvantage, and sometimes exacerbates the very conditions or impairments of disabled students, further increasing vulnerability within major power imbalance dynamics.

Additionally, other measures necessary for inclusion, are enforceable measures to ensure policies and requirements are genuinely accessible in its structure and operations. There must be strengthening of responsibility requirements for governing bodies with real penalties. One way to achieve this is the use of *co-design*, as the minimum to ensure effective and meaningful participation. Inclusive recruitment must be defined and understood. Employment application processes and student application processes must be made accessible for it to be inclusive. The same must exist for the workplace, research facilities, and all learning environments. Similarly, retention of postgraduate students (coursework, higher degree by research and researchers) is crucial, there must be more effective measurements to track the progress, success and 'disadvantages' experienced by disabled students. Institutions must be held accountable to the governing body, and the disability cohort itself. Lastly, professional development must occur in tandem to initiatives aimed at building institutional capability. Training for staff, and support to staff and students must be made accessible, and requires embedding safeguards within policy to underscore each and every operational activity, and academic process. These measures are necessary to meet the support needs of diverse groups, and specifically students with disabilities.

- **Universal Design:** Universal Design and Universal Design for Learning (UDL), has especially strong potential to improve outcomes because it simply addresses barriers before individual students have even begun their studies, and aims to reduce the need for individualised adjustments, that require strenuous effort to disclose, negotiate or contest them. Well-documented bureaucratic disablement and the exacerbated disadvantage stem from the current model of disability support in higher education. A model that is reactive, and places responsibility on students with disabilities to identify barriers, request adjustments and self-advocate for the implementation of these adjustments. One way to ensure Universal Design more

broadly, and UDL specifically, can drive 'a more inclusive and equitable higher education system' is to mandate UDL across institutions, and notably across supervision, research training, assessment and facilities. Targeting the postgraduate and HDR specific contexts will improve research output, HDR timelines, and overall outcomes for a greater student population, well-beyond the postgraduate students with disability cohort. That is the inherent value of UDL. The benefits it has to all students, reaching a wide population that can improve the lives of a diverse population. UDL in digital, physical, policy and learning environments would reduce common barriers. UDL will likely lessen reliance on often labyrinthine student support services, appeals processes and special consideration processes. Offsetting these pressures on operational systems enables the services to provide improved support to students who use them, and likely more promptly. Especially in supervision models, research training and assessment processes, UDL as a proactive design approach will finally begin to address barriers often excluding and limiting participation, success and output for disabled postgraduate students.

- **Inherent Requirements:** Reform is essential for inherent requirements, but will only improve equity if the standards make clear that inherent requirements are evidence-based (rather than assumption-driven), and are assessed with adjustments in place. Inherent requirements raise major concerns on the potential risk of discrimination. Universal Design principles embedded into the assessment and determination of inherent requirements can assist to align with the consultation papers to ensure they are 'flexibly designed'. Although these principles and practical assessments informed by UDL, must be regularly reviewed, and have permanent, empowered disability representation on the relevant decision-making bodies. Too often are disabled thoughts, insights and voices ignored, or entirely absent from these processes, which in turn, impacts prospective students and society to ever conceive of what is *possible* for persons with disability. CAPA's 2025 DDA parallel these sentiments, stating that current inherent requirements often operate as gatekeeping mechanisms, excluding disabled students from entire fields based on assumptions rather than evidence, and recommends that inherent requirements be assessed with adjustments in place, subject to consultation, and explicitly documented in postgraduate programs rather than left to subjective supervisory judgment. This reform is one most likely to improve outcomes, measurable outcomes and societal change.

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

For people with disabilities, the proposed themes have been relevant and identified for many decades, and deemed to likely and significantly promote accountability, better governance and improved provider practice in higher education. However, initiatives, legislation and compliance frameworks have continually failed to substantially change largely persisting practices of inaccessibility, ableism and discrimination. For the HESF requirements to be effective, the amendments must move beyond symbolic recognition and create measurable institutional duties. CAPA agrees with the Consultation paper to ensure allocation of disability-specific responsibilities or staff obligations in the Threshold Standards, and proactive design measures for *inclusion* woven into governing body responsibilities, institutional planning, participation and staff capability-building processes. Additionally

explicit accountability across all operations, Work Integrated Learning (WIL), and postgraduate specific contexts will have profound benefits to all stakeholders.

CAPA's two 2025 submissions - on the review of the DDA and DSE - elucidate that accountability failures are presently structural. The submissions identified a lack of transparency around disability funding, inadequate data, weak oversight and governance, and the absence of meaningful reporting on outcomes for disabled students, especially postgraduates and HDR candidates. CAPA therefore recommends public reporting on disability funding allocation and expenditure, mandatory data collection disaggregated by level and discipline, current Disability Action Plans as conditions of funding, and reporting by assessment authorities on adjustment applications and outcomes. These governance mechanisms can begin to enhance accountability and close the wide-equity gaps present. The submissions also highlighted that many universities do not have current Disability Action Plans and that existing plans often fail to address HDR supervision or measurable postgraduate outcomes. CAPA recommends that further distinction is needed to determine what category - student or staff - HDR candidates and postgraduates are protected under, for the purposes of seeking support for adjustments, other student services and the processes by which education providers require persons with disabilities to follow.

The real governance value in the themes proposed lies in whether they become attached to:

- Governing body responsibilities for disability inclusion;
- Training and capability-building for academic and supervisory staff;
- Data collection and public reporting obligations;
- Reviewable standards for inherent requirements;
- Enforceable adjustment processes; and
- Independent oversight and penalties for non-compliance.

The strength of governance and accountability measures directly impacts postgraduate education. The prospective career opportunities and academic achievement of persons with disabilities who are postgraduate students is reliant on functioning oversight mechanisms, accessible places, and safe processes to raise concerns. Matters of governance for students with disabilities, requires institutionally governed practice. Explicit compliance architecture is required to be attached to - normative concepts such as - Inclusion and Universal Design to ensure their success. As they only become governance tools when tied to complaints reporting, funding conditions, and institutional review. CAPA is grateful to participate in any consultation to ensure higher education becomes accessible, reflects best practice of inclusion, and positively shapes the future of higher education for **all** prospective students.

Emerging technologies and the Higher Education Regulatory Framework

8. 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.

The term 'emerging technologies' does not adequately capture the breadth of technologies changing higher education. An appropriate term could be: "*technologies with potential*

educational impacts” or equivalent, as long as it captures the fact that these technologies could potentially significantly alter education delivery.

9. Do the standards currently provide adequate guidance to manage risks related to emerging technologies?

Current technological advancement moves at such a rapid pace that standards need to be broad to ensure appropriate capture. Universities need to be empowered to apply standards that are consistent Australia-wide.

The international examples given are a good model for an Australian response to AI specifically. Serious problems arise when we consider the real impacts these services may have on workforce productivity. The value of higher education will be dramatically diminished when an employer cannot be assured that a candidate truly possesses the skills purported by the degree. For every year a person is at university, they cannot fully participate in the workforce, further reducing workforce size and productivity. If a graduate cannot use the investment in their education to actually produce, then our education system will lose all national and international value.

The government needs to be bold in its leadership in AI to ensure that both the positives and negatives of widespread AI use are acknowledged and addressed. We recommend the following: 1. Generative AI should be removed from teaching and learning where reasonably possible, and all efforts should be made to ensure students are not using generative AI in their work; 2. Australia voice the risks of generative AI, especially to productivity and the environment.

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

We believe that the standards should clearly articulate the teaching and research of AI development, ethics and broader importance in society for relevant courses. Yet should enshrine that critical thinking and quality assurance of core skills must be demonstrated without AI usage.

Approach to a cyclical review of the Threshold Standards

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

CAPA recommends that the higher education standards panel be retained, and that CAPA be offered permanent membership to the panel, and its successors.

12. How can a review process be designed to meaningfully engage a diverse range of stakeholders?

Such a review should involve student co-design from the outset, including students and representatives from the relevant peak bodies such as CAPA.