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Higher Education Standards Panel (HESP)
via HESFconsultation@atec.gov.au

Group of Eight Universities (Go8) submission to HESP consultation on Threshold Standards

Overview

The Group of Eight (Go8) supports the continuation of the existing high-level, principles-based approach embedded in the Threshold Standards, alongside student-centred and outcomes-driven reforms that will strengthen the focus on student outcomes, equity, safety and public trust.

Since their introduction, practice across the higher education sector has continued to mature and improve. This evolution has been supported by a growing suite of guidance and resources developed collaboratively with the sector and delivered through TEQSA, including Guidance Notes, Statements of Regulatory Expectation, webinars, workshops, and other opportunities for organisational and professional development.

There is further opportunity to expand the reach, coverage and depth of these materials through partnerships with ATEC and other stakeholders, including initiatives such as the Enhancing Professional Practice in Higher Education program led by the Interim ATEC.

Implementation detail and good practice should continue to be developed and disseminated through these established mechanisms, ensuring that the Threshold Standards remain strategic, stable and foundational.

The Go8 strongly cautions against overly prescriptive and process-driven standards that risk encouraging reductive compliance attitudes and stifling genuine innovation and understanding of providers' particular cohorts and contexts.

In a mature higher education system, diversity of mission, scale, cohort composition and delivery models is a strength, not a risk to be managed. Effective regulation should prioritise student outcomes and lived experience, rather than enforcing uniform processes across the sector.

Key points

- The Go8 supports the existing high-level, principles-based Threshold Standards and student-centred, outcomes-driven reforms focused on student outcomes, equity, safety and public trust.
- Overly prescriptive and process-driven standards risk fostering compliance-focused behaviour and stifling genuine innovation.
- Diversity across providers is a strength of the system and uniformity does not guarantee quality or success.
- Detailed advice and guidance on implementation should be co-designed with the sector and provided through TEQSA.

Demonstrating a commitment to addressing racism

- The Go8 supports stronger expectations on providers to actively address racism and foster inclusive environments through whole-of-organisation plans.
- An outcomes-based framing is preferred over prescriptive policy or process requirements.
- Listening to students and staff and being responsive to local contexts should be the priority.

Additional Commentary

Go8 universities reject all forms of racism, discrimination, harassment and vilification and are committed to sustained, transparent action to ensure campuses are safe, inclusive and respectful for all. We recognise the responsibility we hold to respond credibly and constructively to the truths that have been shared.

Policies and frameworks are necessary but not sufficient.

Trust is built through action: embedding fairness and transparency across organisations; leadership that is visible, accountable and engaged; and the consistent demonstration of respect and inclusion in everyday practice.

The Go8 supports stronger expectations within the Threshold Standards requiring providers to take a whole-of-organisation approach to preventing and responding to racism. This should be articulated as a high-level, principles-based expectation, rather than through prescriptive requirements.

As noted by the Australian Human Rights Commission in the *Respect at Uni* report, such approaches must reflect each provider's history, context and aspirations, and be grounded in co-design with First Peoples and other groups who experience racism.

The Threshold Standards should include a clear overarching statement affirming that all standards and expectations for student outcomes apply equally to all students, and that implementation must not create or exacerbate discrimination. This approach is more effective than attempting to address racism through piecemeal amendments to individual standards.

An outcomes-based framing should prioritise cultural understanding and lived experience over process and documentation. Listening to students and staff and responding to local contexts must remain central.

The Threshold Standards can appropriately frame expectations around themes such as:

- Safe, inclusive learning and working environments
- Student and staff experience
- Staff capability to support respectful engagement

Incorporating the University Governance Principles and transparency requirements

- The Go8 supports strong internal governance and transparency as necessary foundations for fostering quality and trust.
- The proposed 'Part C – Additional Standards for Public Universities' contradicts the core regulatory approach of risk and proportionality.
- Providers must retain adequate flexibility in how they demonstrate effective governance and academic oversight.

Additional Commentary

Strong governance and transparency are critical to sustaining quality and public confidence.

However, governance arrangements must recognise and accommodate the diversity of provider missions, scale and legislative foundations. Uniformity is not a substitute for effective governance.

The proposed *Part C - Additional Standards for Public Universities* risks creating a hierarchy of providers based on category rather than risk, undermining the regulatory framework's commitment to proportionality. It may also unintentionally imply that public universities are either inherently riskier or inherently superior - neither of which reflects the reality of a diverse and high-performing sector.

Such an approach may constrain institutional evolution and limit pathways to university status. If additional obligations are to apply to Table A or Table B institutions, they should be addressed through the **Higher Education Support Act 2003** and relevant delegated legislation, rather than through the Threshold Standards.

If governance principles are referenced within the Threshold Standards, further work will be required to clarify expectations while preserving provider flexibility. It must also be recognised that many governance arrangements - particularly for universities established by statute - are mandated by state or federal legislation and are not fully within institutional control.

Supporting people with disability in higher education

- Go8 universities strongly support improved access, participation, and success for people with disability and universal design, equal opportunity and inclusion as system level principles.
- Meaningful and direct engagement between staff and students will ensure that local settings reflect both these high-level principles and the provider-level conditions that enable success.

Additional Commentary

The Go8's focus is on student success and achievement. Within the Threshold Standards, emphasis should remain on outcomes and system characteristics rather than attempting to codify individual needs or circumstances.

Meaningful engagement between staff and students enables local settings to reflect high-level principles while responding effectively to provider-specific contexts. Diversity of approach does not equate to inconsistency or poor quality; prescriptive procedural requirements risk limiting innovation and responsiveness.

A focus on outcomes and continuous improvement is best supported through:

- Student and staff voices
- Peer benchmarking
- Sector-led sharing of good practice
- Robust internal review mechanisms

Emerging technologies and the Higher Education Regulatory Framework

- The Go8 supports technology-neutral regulation focused on outcomes and integrity.
- There should be clear expectations for governance and risk management, but particulars of risk management must be the responsibility of the provider and its governing bodies.

Additional Commentary

The evolution of TEQSA's approach to generative AI illustrates the need for adaptable regulatory philosophies across the lifecycle of emerging technologies. Practices may evolve, decline and re-emerge - such as the renewed use of *viva voce* - requiring flexible, outcomes-focused regulation.

Regulation should focus on:

- Student experience and learning outcomes
- Research integrity
- Equity, safety and public trust

The Threshold Standards should articulate clear expectations for governance and risk management, while leaving the particulars to providers and their governing bodies. Corporate governing bodies should focus on strategic, financial and reputational risk, while academic governing bodies address academic quality, pedagogy and research implications.

Specifying detailed governance or oversight mechanisms risks undermining academic judgement and institutional flexibility. Detailed guidance on emerging technologies should be co-developed with the sector and provided through TEQSA guidance materials, rather than embedded in the Threshold Standards.

Approach to a cyclical review of the Threshold Standards

- The Go8 supports a cyclical review process that is proportionate and evidence-informed and grounded in student outcomes and sector performance.
- A dedicated body with representative membership from across the sector would be ideal to manage this process.

Additional Commentary

A cyclical review process should be responsive to emerging and systemic risks while following a clear, predictable timeline to avoid unnecessary regulatory churn. A dedicated body with representative sector membership could coordinate both targeted, time-critical reviews and comprehensive reviews, providing continuity and acting as a repository of regulatory and institutional knowledge.

This process should leverage existing sector activities, including:

- Peer benchmarking
- Sector collaboration
- Internal review cycles

Conclusion

Australia's higher education system benefits from diversity, autonomy and innovation. Strong outcomes are achieved when providers engage openly with staff and students, work collaboratively toward shared goals, and operate with clarity about mutual responsibilities and expectations.

The Go8 remains committed to maintaining the existing high-level, principles-based Threshold Standards and to implementing student-centred, outcomes-driven reforms that strengthen student outcomes, equity, safety and public trust.

The Threshold Standards should remain the foundation and the goal - not an instruction manual. The sector should be proud of the extensive suite of guidance and resources co-developed through TEQSA, and continue to build on this collaborative approach.

Strong, autonomous and diverse providers - working closely with students and staff - are central to the success of Australia's higher education system.

For further discussion on this submission, please contact me via email at [REDACTED]

Yours sincerely



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