

Higher Education Standards Panel Secretariat  
HESFconsultation@atec.gov.au

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## **Murdoch University's response to the Higher Education Standards Panel Consultation on Amendments to the Higher Education Standards Framework (Threshold Standards) 2021**

Murdoch University (Murdoch) welcomes the opportunity to respond to the Higher Education Standards Panel's consultation on proposed amendments to the Higher Education Standards Framework (Threshold Standards) 2021. The University supports the broad intent of the proposals, particularly where they seek to strengthen student wellbeing, inclusion, academic quality and public confidence in Australian higher education.

The enduring strength of the HESF lies in its principles-based, outcomes-focused design. By articulating clear expectations while allowing institutions flexibility in how those expectations are met, the Framework has supported both quality assurance and institutional diversity across the sector. This balance has served the sector well and remains critical as higher education continues to evolve. Murdoch supports the objectives of the proposed amendments, including the emphasis on inclusion, wellbeing, governance and quality assurance. The University recognises the importance of addressing systemic risks, such as racism, accessibility barriers and the ethical use of emerging technologies, within a coherent, durable and well-integrated regulatory framework.

At the same time, Murdoch emphasises that amendments to the HESF should remain proportionate, principles-based and outcomes-focused, consistent with the original design of the Standards. There is a risk that introducing additional or more detailed requirements may increase compliance effort without delivering corresponding improvements in student outcomes or educational quality.

Across the consultation themes, Murdoch's response reflects a consistent position. New or emerging issues are best addressed through guidance and interpretation rather than prescription. Expectations should be integrated within existing wellbeing, equity and governance provisions wherever possible, and the application of the Standards should remain sensitive to institutional context and risk. Any differentiation for public universities should be carefully calibrated to strengthen accountability without adding unnecessary administrative burden.

In this context, Murdoch encourages a light-touch and proportionate regulatory approach that builds on existing standards, governance arrangements and guidance. Sustainable improvement in student experience and institutional culture is most likely achieved through clarity of intent, shared understanding and risk-based oversight, rather than through the accumulation of additional prescriptive requirements.

A regulatory approach that reinforces existing frameworks, supported by clear guidance and constructive engagement with the sector, will best sustain quality, inclusion and innovation in a rapidly changing higher education environment.

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

Murdoch supports clearer expectations that recognise racism as a systemic risk requiring visible and sustained institutional attention. Such expectations are most effective when they focus on leadership, governance and institutional culture, rather than prescribing uniform operational actions. An institution-wide commitment can be demonstrated through clear statements of values and conduct, accessible and culturally safe reporting mechanisms, and governance oversight that ensures concerns are addressed consistently and transparently. Leadership visibility, appropriate resourcing and clear accountability are more powerful signals of commitment than detailed regulatory prescription.

Care should be taken to avoid requirements that are overly prescriptive, particularly in areas such as curriculum design, where disciplinary norms, professional accreditation requirements and course structures vary significantly. The Standards should emphasise the creation of safe and inclusive learning and working environments, while allowing providers flexibility in how those outcomes are achieved.

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**Consultation Question 2 - What targeted guidance would most effectively support providers to meet strengthened antiracism expectations?**

Murdoch strongly supports the development of sector-wide, co-designed guidance in preference to additional standards. Guidance is well suited to clarifying expectations, promoting shared understanding and supporting consistent practice without increasing regulatory burden.

Useful guidance could include clarification of how existing wellbeing, complaints and governance standards apply in an antiracism context, and advice on monitoring institutional culture and student experience. Such guidance should be adaptable to local context and focused on strengthening the application of existing standards.

More broadly, care is needed to ensure that the Standards do not single out one form of harm or discrimination in isolation. Other prescriptive frameworks, such as the National Higher Education Code to Prevent and Respond to Gender-based Violence, already operate alongside the HESF. Calling out one “ism” within the Standards risks fragmentation and inconsistency, where a more integrated approach would better support cultural change.

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

Explicit recognition of racism within the Standards can play a useful signalling role. It affirms that racism is a systemic risk to student wellbeing and institutional integrity, and that governing bodies and senior leaders are expected to exercise stewardship in addressing it.

The principal limitation arises where explicit antiracism standards become standalone, highly prescriptive, or embedded by default within curriculum requirements, rather than operating through existing wellbeing, equity and governance frameworks. Cultural change is difficult to regulate through

narrow prescription, and there is a real risk that compliance activity expands without delivering commensurate improvements in outcomes.

In particular, formally requiring antiracism to be built into curriculum content may prove problematic. Many courses, especially those that are technically focused, professionally accredited or tightly regulated, do not include explicit “soft skills” components. Curricula are already full, and introducing additional mandated content would be challenging without displacing core disciplinary learning. If curriculum inclusion were required, providers would also need to be able to demonstrate where and how such content is addressed across all courses, creating a significant and ongoing compliance burden. This approach risks opening the door to further expectations that additional social or cultural issues be embedded in curriculum, placing increasing pressure on course design, approval and review processes.

A more effective and proportionate approach is to ensure that all staff create and sustain safe learning and teaching environments, and that appropriate behaviours are modelled consistently through teaching practice, assessment, supervision and everyday interaction with students. These expectations are already well supported through existing standards relating to wellbeing, staffing, governance and institutional culture.

Strengthening the application of existing provisions, supported by clear guidance, is therefore likely to be more effective than expanding prescriptive curriculum requirements. This approach aligns with the intent of the HESF, supports institutional diversity, and avoids unnecessary regulatory expansion.

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#### **Consultation Question 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”?**

Applying certain governance standards specifically to public universities can be justified on proportionality grounds, reflecting their public mandate, stewardship of public funds and heightened accountability obligations. Clear expectations may strengthen governing body assurance and public confidence.

However, risks arise if additional requirements shift governing bodies’ focus from strategic stewardship to procedural compliance, or if they introduce unnecessary duplication with existing public accountability mechanisms. Differentiated standards may also complicate comparability and collaboration across the sector.

Any public-university-specific standards should therefore remain high-level, outcomes-focused and carefully aligned with existing frameworks to avoid unnecessary administrative burden.

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#### **Consultation Question 5**

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

The existing Standards already provide a strong framework for academic oversight and teaching quality. Further “strengthening” risks duplicating established assurance processes without delivering proportional benefits for students.

Where robust mechanisms are already in place and focused on student outcomes, additional mandated reporting, such as routine staffing profile reviews, may add administrative effort without improving experience or performance. In some cases, prescriptive staffing requirements could disrupt established models and affect continuity for students.

Improvements in student outcomes are more closely linked to how standards are implemented and monitored than to the addition of new regulatory requirements. Any enhancements should therefore be targeted, risk-based and supported by guidance, while preserving flexibility and innovation in teaching and learning.

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### **Consultation Question 6**

**To what extent would the proposed themes (inclusion, universal design and inherent requirements) drive a more inclusive and equitable higher education system and improved student outcomes?**

The proposed themes point to the need for systemic, proactive change, supported by guidance that moves practice beyond compliance and toward demonstrable improvements in student experience and outcomes. Disability inclusion is most effectively understood as a core element of educational quality, rather than as a specialist or supplementary concern.

Clear, practical guidance on Universal Design and Universal Design for Learning (UDL) would support more consistent implementation across the sector. When embedded within existing course review, teaching evaluation and quality assurance processes, UDL can reduce reliance on individual adjustments, benefit the broader student cohort, and be sustained without additional regulatory machinery.

At the same time, greater clarity and transparency in relation to inherent requirements would strengthen equity and confidence for students, ensuring that requirements remain proportionate, defensible and genuinely necessary. Overall, the themes will have greatest impact where they are supported by whole-of-institution leadership, capability-building and co-design, and reinforced through guidance that is clear, practical and focused on implementation rather than compliance alone.

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### **Consultation Question 7**

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

Clear expectations around inclusion and accessibility can strengthen accountability and governance when accompanied by strong institutional ownership and capability-building. Accountability is most effectively achieved through leadership and governance responsibility, rather than through additional procedural requirements.

Guidance and education are likely to be more effective levers for improvement than expanded compliance obligations.

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### **Consultation Question 8**

#### **Does the term “emerging technologies” adequately capture the range of innovations transforming higher education?**

Murdoch considers the term “emerging technologies” to be sufficiently broad, provided it is applied flexibly. Avoiding the naming of specific technologies will help ensure the Standards remain durable and responsive to ongoing change.

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### **Consultation Question 9**

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

The existing Standards are broadly fit for purpose in managing risks associated with emerging technologies at a high level. The primary gap lies in interpretive guidance rather than in the structure of the Standards themselves.

Strengthening guidance on governance oversight, ethical use, academic integrity and risk management, without increasing prescriptiveness, would support consistent implementation while preserving institutional flexibility.

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### **Consultation Question 10**

#### **How should amended standards balance risk management with provider flexibility to support innovation?**

A high-level, principles-based approach remains the most effective way to balance risk management with innovation in a rapidly evolving environment. Prescriptive requirements risk becoming outdated and may unintentionally constrain beneficial innovation.

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### **Consultation Question 11**

#### **What methodological approaches should underpin a cyclical review to ensure it is robust, proportionate and evidence-informed?**

A cyclical review should be risk-based, evidence-informed and transparent, focusing on areas of demonstrated concern rather than routine wholesale revision.

Given the high-level nature of the Standards, a five-year review cycle risks generating unnecessary change and disruption for students and staff. A longer cycle, aligned with the existing seven-year review period or extended to ten years, may better support regulatory certainty while minimising compliance burden.

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### **Consultation Question 12**

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

Meaningful engagement requires early and inclusive consultation with providers, students, staff and affected communities, using proportionate and accessible mechanisms. Clear feedback loops that demonstrate how input has informed outcomes are essential to building trust and sector confidence.

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### **Concluding Comments**

Murdoch University supports the continued evolution of the Higher Education Standards Framework (Threshold Standards) 2021 where it strengthens quality, equity and public confidence in the sector. In doing so, it is essential that amendments remain faithful to the HESF's foundational principles of proportionality, flexibility and outcomes-focused regulation.

A light-touch approach that prioritises guidance, integration and risk-based oversight will better support sustainable improvement than expanded prescriptive requirements. Such an approach recognises institutional diversity, limits unnecessary compliance burden, and allows universities to focus their efforts where they matter most: on the quality of learning, teaching and the student experience.

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### **Contact**

Dr Verity Morgan

Director Quality and Standards and University Secretary