



## Queensland University of Technology

### Response to the Higher Education Standards Panel consultation on amendments to the *Higher Education Standards Framework (Threshold Standards) 2021*

March 2026

QUT thanks the Higher Education Standards Panel (the Panel) for the opportunity to inform its advice to the Minister for Education on potential amendments to the *Higher Education Standards Framework (Threshold Standards) 2021* (the standards) to address matters the consultation paper describes as ‘emerging and high-priority issues.’

QUT advises the retention of the principles-based approach that has underwritten the standards to date, and that has served well Australian higher education and its students. This approach ensures that regulatory attention focuses on the desired outcomes that will best support a positive and effective learning environment for all students. We counsel against the introduction of overly prescriptive specific measures, which carry a raft of risks including overly narrow scope, rapid obsolescence, insensitivity to local conditions and contexts, the production of gaps and blind spots, distraction from frontline student support and core teaching activities, and regulatory duplication (or even conflict).

Overall, QUT supports a principles-based strengthening of the Threshold Standards with an emphasis on flexibility, academic integrity, inclusion, and proportionate regulatory expectations. However, the addition of another in a succession of novel or expanded regulatory obligations will be accompanied by nontrivial resource and/or service provision implications. We ask the Panel to acknowledge that inevitable impact within its advice to the Minister.

The establishment of strengthened standards across all these domains will entail considerable additional resourcing for capability building (workload, professional development and governance capacity), operational delivery and accountability/compliance reporting. Funding for delivery must include a consideration for these and other related regulatory impositions, if they are to be incorporated in providers’ operations without taking resourcing and attention away from primary delivery.

It would be a tragic irony were the expansion and refinement of the Threshold Standards to result inadvertently in a net decline in the quality of the student experience – but that is a real risk if Government does not match its increasing expectations with the additional resources required to assist institutions to meet them.

## **1. Demonstrating a commitment to addressing racism**

### ***q1. What specific actions should higher education providers be required to take to demonstrate a clear, institution-wide commitment to addressing racism?***

Institutional policies should clearly delineate governing body and management responsibilities in this area.

Institutions should:

- Ensure that they have policies that explicitly address the prevention of and means of responding to racism on campus (both interpersonal and systematic);
- Demonstrate how their current risk, safety and equity, diversity and inclusion governance mechanisms address racism;
- Implement Australian Human Rights Commission recommendations relating to transparent reporting of racism-related complaints, within a sector-wide standardised format;
- Provide nationally created, standardised and accredited anti-racism training, with progress and results reported to their governing bodies; and
- Demonstrate how racism, bias and inclusion is considered in curriculum, teaching and learning methods.

### ***q2. What targeted guidance would most effectively support providers to meet strengthened anti-racism expectations?***

Institutions would be assisted by the provision of:

- Clear and standardised definitions of racism (including systematic racism, and specific forms of racism such as antisemitism, Islamophobia, and anti-Indigenous and anti-Asian racism);
- State/Territory-specific case guidance for the management of racism complaints;
- Standardised templates for complaints data reporting, institutional evaluation and impact tools;
- Nationally developed anti-racism modules specific to higher education for all staff;
- Standardised, nationally provided training on interpersonal and systemic racism available to all students in Australian higher education (universally available but not necessarily mandatory); and
- National provision of a survey tool with standardised survey questions measuring racism to be used by individual institutions, with confidential benchmarking.

### ***q3. What are the principal benefits and potential limitations of explicit anti-racism standards compared with reliance on existing wellbeing, equity and governance provisions?***

Like measures addressing similar issues, the establishment of explicit anti-racism standards risks expanding the Threshold Standards – fundamentally established to ensure the quality of higher education provision in Australia – to a range of concerns so wide as to undermine their coherence and take attention away from their core purpose.

In the case of racism (alongside other forms of personal and structural discrimination, such as misogyny), an argument may be made that this risk is acceptable and manageable, in light of the significant benefit to the learning environment and the sum of individual student experiences that would accrue from a significant reduction in incidents of racism. Furthermore, the antiracism effort itself provides a beneficial learning opportunity for people expanding their intellectual and social horizons in an inherently formative setting.

However, any explicit anti-racism requirements in the standards must be carefully worded so they:

- Build on existing systems and processes, focusing on depth and impact;
- Remain principles-based and scalable, rather than highly detailed and specific;
- Minimise any additional administrative or financial burden;
- Are supported by national guidance and shared resources; and
- Avoid duplication with existing legal obligations.

## **2. Incorporating the Governance Principles and transparency requirements**

### ***q4. 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 proposal to limit some standards to 'public universities' is counter-intuitive. While public universities do educate the vast majority of the students in Australian higher education, they are also already the most highly regulated, and the best equipped – by virtue of scale, experience and resources – to meet requirements. It seems contrary to impose special conditions on the institutions most likely to be both fulfilling their obligations and able to demonstrate that performance. If a standard is not important enough to be required to protect the experiences of students enrolled at private universities and non-university higher education providers, we question whether it warrants inclusion at all.

We do not oppose the incorporation of the University Governance Principles in the standards, providing the reporting requirements can be harmonised with universities' other related governance reporting obligations, including to our respective state and territory governments.

### ***q5. How might strengthened standards on academic oversight, staffing profiles, and teaching quality affect student outcomes and experience?***

QUT supports the strengthening of governance expectations that enhance academic oversight of course quality, curriculum integrity, staffing capability and assessment standards, and we are in favour of enhanced transparency and accountability measures for public universities as a matter of general principle.

We particularly endorse the retention of the principles-based approach, as outlined in the consultation paper, to preserve essential institutional and disciplinary flexibility. We ask that the Panel recommends the deployment of guidance notes where possible – in preference to infusing the standards with excessive detail – as they offer a more nimble, flexible and responsive means of influencing the culture of practice across the sector.

Strengthened standards will enhance student outcomes and experience as long as their incorporation – and the obligation to report on them – is properly resourced and avoids duplication, as mentioned above. An unfunded regulatory and compliance reporting burden – especially when it is duplicative – risks detracting from the student experience and compromising student outcomes, as it pulls resources and attention away from the front-line and from the chalkboard.

### **3. Supporting people with disability in higher education**

***q6. 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?***

The proposed themes of inclusion, universal design and inherent requirements are appropriate and align with contemporary disability practice. They have great potential to improve equity and student outcomes in higher education. They will, however, need to be supported by systemic, rights-based reform, and funding to support implementation, including quality professional learning for academic staff to acquire the requisite knowledge and skills.

The paper's focus on universal design would be strengthened by explicitly referencing Universal Design for Learning (UDL), particularly in relation to curriculum design, teaching and assessment, where many access barriers persist. UDL at scale can also support elevating digital accessibility and inclusive design from 'recommended' status to core business, with leaders empowered to make equity/accessibility training mandatory for sessional, probationary and ongoing academic staff, and to recognise this capability in promotion/tenure processes.

The adoption of universal design has significant potential but the concept of 'learning environments' must extend to explicitly include curriculum, assessment, pedagogy, and digital environments. Reducing unnecessary linguistic, procedural, and visual complexity in assessment and pedagogy benefits all students and reduces reliance on support services. Accessible assessment redesign enables equitable engagement while maintaining academic integrity and inherent requirements. Quality professional learning is essential to addressing misconceptions and ensuring that inherent requirements are applied appropriately.

While the proposed anchors are strong conceptually, principles alone will not ensure equity. Greater consistency across the sector would be beneficial. Currently, universities interpret disability and accessibility obligations differently, resulting in uneven practice and student experience. Without clearer shared expectations, implementation will continue to vary between institutions. Some form of sector-wide quality assurance or agreed standards would support consistent interpretation, implementation and sustainable practice. This does not need to be a traditional audit process, but there must be a formal way for institutions to evidence practice and share successful approaches.

From a student perspective, equity should mean a broadly comparable experience regardless of which Australian university they attend. At present, access and support are often shaped by local rules, culture and resourcing. Without clearer expectations for implementation and review, there is a risk these reforms remain aspirational rather than operational. Greater consistency would benefit students by reducing inequity between institutions and support staff by reducing uncertainty and localised decision-making.

We strongly support the Panel’s proposal to modernise the standards’ nomenclature to embrace inclusive language and retire the deficit thinking behind terms such as ‘special needs’.

***q7. To what extent would the proposed themes promote accountability, better governance and improved provider practice to support people with disability in higher education?***

The success of measures will depend on authentic consultation with students and staff with disability in policy design and review, and for mechanisms to measure both academic outcomes (e.g., unit/course completions) and social outcomes (wellbeing, belonging, participation).

Meaningful progress on inclusion in higher education requires cultural and structural change within universities. Two major barriers that complicate inclusion in this level of education, in comparison to other levels, are competitive entry processes, which can lead staff to treat curriculum difficulty as a fixed hurdle, and large student/staff ratios, which distance students from those designing curriculum. Generic adjustments are therefore often provided but may not address deeper instructional barriers.

The proposed themes support a beneficial shift from disability being treated as a specialist support issue to a whole-of-institution responsibility. This shift will only be effective if universities are required to demonstrate how inclusion, universal design (including UDL), and inherent requirements are embedded in curriculum design, course approval, delivery and review.

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

***q8. 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.***

Yes, the term ‘emerging technologies’ does adequately capture the range of innovations and digital technologies that are currently transforming higher education – moreover, it will continue to adequately describe future transformative innovations and technologies.

The standards should retain adaptable overarching terminology that can continue to be interpreted to present-day application without constant updating.

QUT advises against the introduction of alternative terminology.

***q9. Do the standards currently provide adequate guidance to manage risks related to emerging technologies?***

Yes, the standards do currently provide adequate guidance to manage risks related to emerging technologies.

Furthermore, they are reinforced in this respect by a raft of other regulatory and governance obligations and practices. University governing bodies already operate under a suite of explicit expectations that they identify and manage risks and opportunities from emerging technologies in learning, teaching, research and operations, including covering integrity, data governance, safety and equity.

The incorporation of, and adaptation to, innovation and new technology in the methods, context, context and operation of higher education is neither new nor unusual – it is an important element of normal governance and management. Specific instances of new technology require specific measures, but the general approach to the management of risk and opportunity both endures and evolves.

***q10. How should amended standards appropriately balance the management of risks with the need to preserve provider flexibility, so as to support ongoing innovation?***

The standards do not need changing. Instead, guidance notes could accommodate what TEQSA expects to see, for example in areas such as privacy, equitable access, responsible use and authentic assessment. Universities need adaptive policies to which they can respond as required, not prescriptive checklists that will be narrow, overly detailed, incomplete and rapidly out of date.

The standards should support the adoption of an institution-wide, coherent approach based on principles-based requirements, allowing faculties to tailor responses to discipline-specific contexts and avoid constraining innovation.

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

### ***q11. What methodological approaches should underpin a cyclical review of the Threshold Standards to ensure it is robust, proportionate and evidence-informed?***

Ideally the standards should be sufficiently principles-based as to provide that continuous incremental improvement would suffice to ensure they remain relevant and effective.

However, if the decision is taken to establish a periodic review cycle, there should be a moratorium on incremental changes being made to the standards in between reviews, other than for amendments that are urgently and obviously required.

Cyclical reviews should be conducted from a position of first determining the standards' fitness for purpose in the contemporary context, in order to establish first *whether* any changes are necessary; only then should specific changes be considered. Cyclical reviews should not be conducted from the starting assumption that change is always going to be necessary.

Reviews should be evidence-informed, proportionate and responsive to genuine sector developments, rather than to transient media focus or other extrinsic interest.

Consideration may be given to aligning cyclical reviews with the maximum seven-year term of registration, rather than the proposed five-yearly cycle, so that lessons learned from the last cycle of re/registrations can be incorporated in each cyclical review.

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

Cyclical reviews must be centred around substantial sector consultation, featuring amply telegraphed timelines and long response windows. This will enable institutions to provide the most relevant, up-to-date, accurate and detailed advice, as they will be able to create structured opportunities for faculty-level academic governance input and the expert contributions of operational professional staff.

A two-stage review process could first establish whether any of the standards are in need of amendment – and if so, which ones and in what ways – before then proceeding to a second round of consultation to solicit and test ideas for potential amendments to deal with any matters identified in the first stage.