

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

I welcome the opportunity to contribute to the consultation on proposed amendments to the Higher Education Standards Framework (Threshold Standards) 2021, which establish the minimum regulatory requirements for higher education providers registered by the Tertiary Education Quality and Standards Agency (TEQSA).

The proposed reforms come at an important moment for Australian higher education. Evidence across the sector highlights persistent challenges relating to racism, inconsistent support for students with disability, governance capability and the rapid impact of emerging technologies. Strengthening the Threshold Standards in these areas is therefore timely and necessary.

From a student equity perspective, the amendments present an opportunity to ensure the regulatory framework better supports safe, inclusive and high-quality learning environments, while maintaining the flexibility required for innovation and institutional diversity.

**Addressing Racism in Higher Education**

Universities should be required to demonstrate a clear, institution-wide commitment to addressing racism that is embedded across governance, policy, curriculum and campus culture.

Explicit anti-racism standards would provide important benefits. They would clarify institutional responsibilities, strengthen accountability and enable TEQSA to more effectively monitor compliance. They would also help restore confidence among students and staff who currently report low trust in institutional responses to racism.

Key institutional expectations should include:

- A clearly articulated institutional anti-racism strategy endorsed by governing bodies and senior leadership.
- Culturally safe learning environments for students and staff from diverse racial, cultural and religious backgrounds, including First Nations students.
- Transparent monitoring and reporting of racism-related complaints and institutional responses.
- Accessible complaints mechanisms that protect students and staff from retaliation.

- Capability development for leadership, academic staff and student services.
- Inclusive governance and participation for students and staff from equity backgrounds.
- Curriculum inclusion, including recognition of First Nations knowledge systems.

Strengthened standards should be supported by practical guidance from TEQSA, including examples of effective institutional practice and clear expectations for monitoring and reporting.

### **Governance, Transparency and Academic Oversight**

Effective governance is fundamental to maintaining public confidence in Australian higher education. Recent sector reviews have highlighted the need for stronger expectations relating to transparency, academic oversight and staffing capability.

Introducing a new Part C of the Threshold Standards for public universities may strengthen accountability by recognising the scale of public investment and the central role these institutions play in national education, research and workforce development.

However, care should be taken to avoid creating a two-tier regulatory framework. Core governance principles including transparency, ethical leadership and academic oversight should apply consistently across all providers, while allowing additional transparency expectations where public accountability is greatest.

Strengthened standards relating to academic oversight, staffing profiles and teaching quality would have a direct and positive impact on student outcomes. Ensuring that courses are supported by appropriately qualified staff, subject to robust academic oversight and delivered through high-quality teaching practices will strengthen student engagement, retention and completion outcomes across the sector.

### **Supporting Students with Disability**

Students with disability continue to experience poorer outcomes and inconsistent support across the higher education sector. The proposed themes of inclusion, universal design and clearer articulation of inherent requirements represent an important shift from reactive compliance toward proactive inclusion.

Embedding inclusion within institutional governance structures would ensure universities take responsibility for creating accessible environments rather than relying primarily on individual adjustments.

Adopting universal design principles across learning environments, digital platforms and campus infrastructure would significantly reduce systemic barriers while improving learning experiences for all students. Clearer guidance on inherent requirements would also improve transparency and fairness, ensuring students understand expectations while protecting their right to reasonable adjustments.

Collectively, these reforms would support a more inclusive higher education system while reinforcing accessibility as a core indicator of educational quality.

### **Emerging Technologies and Artificial Intelligence**

The rapid adoption of artificial intelligence and advanced digital technologies is transforming teaching, learning and research. While the consultation refers to “emerging technologies,” this term may be too broad to guide regulatory expectations effectively.

A more precise focus on AI-enabled and data-driven technologies would better reflect the most significant current risks and opportunities.

While governance oversight, academic integrity protections and risk management frameworks are essential, regulatory settings must also consider broader implications for equity, assessment design, workforce capability and algorithmic accountability.

Amended standards should remain principles-based and technology-neutral, focusing on institutional responsibilities rather than specific tools. Providers should be required to demonstrate that technological innovation is implemented in ways that protect academic integrity, student equity and public trust in higher education qualifications.

### **Cyclical Review of the Threshold Standards**

A five-year cyclical review of the Threshold Standards presents an opportunity to ensure the framework remains contemporary, proportionate and responsive to sector change.

Reviews should be underpinned by:

- System-level evidence, including national participation, retention and completion data and Quality Indicators for Learning and Teaching (QILT) results.
- Regulatory intelligence, including insights from TEQSA audits and student complaints mechanisms.
- Independent expert analysis to assess emerging risks and policy gaps.
- International benchmarking to ensure Australia’s regulatory framework remains globally credible.

Meaningful stakeholder engagement will also be essential. Consultation processes should include diverse voices across the sector, including students, equity practitioners, First Nations communities, disability advocates and regional stakeholders.

Engagement should not be limited to written submissions but include roundtables, workshops and targeted consultations to ensure the standards reflect the lived realities of higher education practice.

The proposed amendments to the Threshold Standards represent a critical opportunity to strengthen the regulatory framework underpinning Australian higher education.

To remain fit for purpose, the framework must ensure universities:

- provide safe and culturally inclusive learning environments
- support equitable participation and student success
- maintain strong governance and accountability
- respond responsibly to technological transformation

Strengthening the Threshold Standards in these areas will help ensure Australia's higher education system continues to deliver high-quality, inclusive and trusted outcomes for students and the broader community.

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