

Submission to the
Higher Education
Standards Panel

March 2026



THE UNIVERSITY OF
MELBOURNE

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

Executive Summary

The University welcomes the opportunity to contribute to the consultation on amendments to the *Higher Education Standards Framework (Threshold Standards) 2021*. To ensure the Threshold Standards remain fit for purpose and continue to provide an effective regulatory framework, it is timely to consider how the Standards can address identified evolving risks.

The University broadly supports amendments to update the Threshold Standards in the areas of governance, racism, emerging technologies and disability. However, any additional Standards should remain high-level and principles-based, focused on desired outcomes rather than prescriptive requirements. This approach is essential to preserve provider flexibility and enable institutions to tailor their responses to their specific communities, delivery models and institutional contexts. This is particularly important in the context of addressing racism, where responses require co-design with relevant communities, and in response to emerging technologies, where specific risks can shift quickly.

Recommendations

The University recommends that the Higher Education Standards Panel:

- Ensures any additional Standards are high-level and principles-based. Further details should be provided via Statements of Regulatory Expectation or other TEQSA guidance materials rather than overly prescriptive Standards.
- Requires higher education providers to take a whole-of-organisation approach to preventing and responding to racism, embedded as a high-level, principles-based Standard.
- Ensures that private providers are also subject to governance principles, noting that TEQSA's regulatory approach is based on risk and proportionality rather than provider category.
- Ensures that any changes to the Standards, including in relation to academic oversight and staffing profiles, maintain appropriate delineation between governance and management functions within the tripartite university governance model.
- Includes the proposed themes of inclusion and universal design in the Standards but ensure these remain broad and flexible to allow universities to apply them to their specific contexts.
- Ensures Standards establish clear expectations around management of emerging technology risks without prescribing how those risks should be managed, with detailed guidance developed through TEQSA guidance materials.
- Addresses governance implications of autonomous decision-making and agentic systems through the Standards, ensuring decisions remain explainable, transparent and subject to human review.
- Takes a robust, proportionate and evidence-informed approach to cyclical reviews of the Standards, engaging early and ensuring all provider types and stakeholders are included in consultations.

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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?

Higher education providers should be required to take a whole-of-organisation approach to preventing and responding to racism. In keeping with the existing requirements in the Threshold Standards, this requirement should be a high-level, principles-based Standard, allowing providers to tailor their responses and actions to their specific communities and circumstances. Details on the interpretation and application of Standards should be provided through TEQSA Guidance Notes or Statements of Regulatory Expectations rather than included in the Standards themselves.

This aligns with the Australian Human Rights Commission's [Respect at Uni](#) report, which emphasises the importance of institution-wide commitments to addressing racism. It recommends that all universities develop anti-racism plans, co-designed with First Peoples and other groups who experience racism, and in partnership with students and staff. The AHRC noted that these plans should be tailored to each university's context, based on "codesign that is grounded in lived experience but also deeply aware of the institutional and cultural factors that impact the change process."¹

The University of Melbourne has demonstrated a commitment to anti-racism through the development and implementation of its [Anti-Racism Action Plan 2024-2027](#), which sits alongside the [Murmuk Djerring Indigenous Strategy 2023-2027](#). Additionally, the University published its first [Annual Report on Racism](#) in May 2025, sharing data about reports of racism made in 2024, and the status and outcomes of those reports. It also provides progress to-date and next steps to acknowledge, understand, prevent and respond to racism in our community. This provides a strong strategic approach to racism that is replicable across the sector.

Other key actions providers could consider in addressing racism, and which can be embedded in university-specific anti-racism action plans, include:

- Trauma-informed, culturally safe support services, available to all students and staff.
- Anti-racism and racial literacy training for staff and students, developed in consultation with groups who experience racism.
- A framework to guide educators to establish inclusive learning environments and to respond to everyday racism, allowing all students to thrive and learn without the burden of exclusion.
- Initiatives to better support international students to connect into the broader university community.
- A review of complaint policies to ensure that they make explicit reference to racism and outline the grounds for lodging a complaint, along with improved transparency of complaints processes, and publication of complaints data.
- Integration of anti-racism and diverse knowledges, including Indigenous knowledges, across curricula.
- Workforce strategies to improve experiences of staff experiencing racism and targets for diversity at senior levels.
- Ensuring that oversight committees and working groups include those with expertise, insight and lived experience of racism, including student representatives where appropriate.
- Collaboration with students to inform communications strategies.

¹ Australian Human Rights Commission, *Respect at Uni: Study into antisemitism, Islamophobia, racism and the experience of First Nations people* (February 2026), 24

As highlighted in the University's submission to the Victorian Parliamentary inquiry into university governance, First Nations leadership at each level of the organisation is critical to addressing racism. As such, Council appointments should be guided by an agreed skills matrix that includes First Nations lived experience.

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

There is limited evidence for what works and what does not work when it comes to the implementation of anti-racism plans in tertiary education settings. Universities should draw on emerging good practice case studies contained in the Respect at Uni report, and cross-sector working groups should be established to share approaches that are effective. Reporting on outcomes and sharing of ideas should be encouraged.

Consideration could also be given to a coordinated national communications campaign across the tertiary sector to reinforce anti-racism expectations, promote shared understanding, and signal collective commitment. A sector-wide approach would help build awareness among staff and students while demonstrating effective practise across institutions.

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

Existing wellbeing, equity and governance provisions have not proved sufficient in eliminating racism from university campuses. A lack of racial literacy education and training has resulted in a lack of understanding about what racism is, and what it is not. This is particularly the case when it comes to everyday racism in teaching and learning spaces – and research suggests that this is the most common form of campus racism. Explicit anti-racism standards will ensure universities implement actions and develop the capacity of all staff and students to recognise and address racism when it occurs.

Some incidents of racism on campus occur through everyday interactions that, while harmful and exclusionary, may not trigger formal complaint mechanisms. Actions should take this into account, and emphasis should be placed on education and prevention, alongside formal complaints processes. Care should be taken to ensure that definitions of racism capture overt racism, everyday racism, structural and systemic racism and interpersonal racism.

Explicit anti-racism standards would also support the development of practical guidance for academic staff on responding to behaviours in teaching and learning environments that may not meet the threshold for a formal complaint but still contribute to a harmful or exclusionary climate. Guidance can help translate principles into practical advice, enabling staff to recognise and address microaggressions and other forms of everyday racism in real time, and reinforcing prevention and early intervention.

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 University of Melbourne is supportive of the Expert Council on University Governance's Principles. The University is broadly compliant with the principles and is implementing further enhancements to uplift our governance processes consistent with the principles and our commitment to continuous improvements. The University welcomes the opportunity to report on its governance practices and processes.

However we note that the aim of TEQSA, when it was established, was to introduce a national system of regulation to assure the quality of all higher education providers. The regulator's approach was designed to

be based on regulatory necessity, proportionality and risk so that TEQSA could focus on “higher risk providers, allowing higher quality, lower risk providers to operate without unnecessary intrusion.”² Having these principles apply only to public universities seems to contradict those aims.

Consequently, were this model to be adopted, it is suggested that governance principles for private providers also be developed or their adherence to the ASX Corporate Governance Principles closely monitored.

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

The University of Melbourne supports strong academic oversight standards and is an enthusiastic proponent of the value of academic governance in monitoring and improving academic quality and standards. This directly and positively affects student experience and student outcomes.

A key feature of University governance is its tripartite model comprising the governing body, academic board, and the university executive or management. This is a system that works across higher education systems globally because it allows for diverse voices and expertise to inform the universities’ self-assurance practices. Each body within the tripartite model has distinct roles and responsibilities: the executive managing day-to-day activities and resourcing; the academic board focussing its knowledge and expertise on maintaining academic quality and standards; and the governing body overseeing the strategy and direction of the institution and monitoring its academic and operational performance.

While provisions in the Threshold Standards on specific issues, such as staffing profiles, could assist in standardising minimum provider self-assurance practices regarding resourcing, care should be taken to ensure that governance and management functions remain appropriately delineated within the tripartite university governance model. Any changes to the Threshold Standards should be designed and implemented with explicit attention to core governance principles such as appropriate delegation, accountability, proportionality and transparency. Strengthened Standards should preserve the necessary separation between governance (strategic oversight and assurance) and management (operational delivery and resource deployment) functions, while ensuring that governing bodies have sufficient, verifiable information to discharge their assurance responsibilities.

Under the current Threshold Standards, academic governance processes must assure that, at the point of course approval, the resources required to deliver the course as approved or accredited will be available when needed. Furthermore, the Standards currently provide that regular interim monitoring, comprehensive reviews, external referencing and student feedback are used to mitigate future risks to the quality of education and to guide and evaluate improvements across the student lifecycle.

The best way to affect student outcomes and experience is to ensure the participation of students and staff in governance processes, specifically in each of the areas of the tripartite model of governance. Student and staff participation should be evidenced in the voices speaking on and to governance bodies and in the wider governance processes of the universities. In academic governance terms, this means involving students in academic policy development and monitoring, in key education debates (for example, in relation to AI and education), and in the evaluation and improvement of teaching, including feedback on academic programs and on teaching and research staff effectiveness.

² Explanatory Memorandum, *Tertiary Education and Quality Standards Agency Bill 2011* (Cth)

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?

While it is difficult to quantify the degree of change the proposed amendments to the Standards may achieve, highlighting inclusion and universal design could drive improvements beyond compliance with the existing legislative framework, including the Disability Discrimination Act 1992. It is also likely that the benefits of a fairer and more inclusive higher education system would extend beyond students with disability.

In that sense, the proposed themes of inclusion and universal design are laudable. They are also in line with the University of Melbourne's commitments through our [Disability Inclusion Action Plan \(DIAP\) 2023-26](#). The current DIAP, which is due to end in May this year, has been a significant first step. We are building universal design principles into our design standards and templates. We also have a strong focus on building our Universal Design for Learning (UDL) capability. This has been particularly driven by the greater lived experience representation that the DIAP has supported. We also now have an active community of practice supporting inclusive pedagogy.

At the same time, the Standards should recognise that inclusion through reasonable adjustments must be considered within the context of each provider's pedagogical approach and commitment to assuring learning outcomes. For example, some adjustments (such as online learning) may not be appropriate to particular delivery modes or assessment types where these are core to the intended learning outcomes, and the Standards should allow for this contextual flexibility.

Our public strategic commitments have been critical to driving access and inclusion. This includes the DIAP, the [Diversity and Inclusion Strategy 2030](#), and [Advancing Students and Education 2023-2030](#). Disability action plans play a critical role. If the Threshold Standards are to be amended to highlight inclusion, reference could be made to disability action plans. This could be accompanied by greater guidance to the sector around disability action planning.

We note that inherent requirements is a concept generally applied in an employment context under equal opportunity laws and it is worth considering whether alternative nomenclature, such as core course requirements, may be usefully applied in educational contexts. In an education context, it will be important for providers to carefully develop and articulate core course requirements—limited to the essential elements necessary to demonstrate intended learning outcomes—with clear reference to how these requirements are located in course materials and what is necessary to obtain the degree.

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

Amendments around themes of inclusion, universal design, and core course requirements are welcome, but they should be broad and flexible in nature. This could be complemented by further detail on the application of the Standards provided via TEQSA guidance materials. This will assist current and future work needed to support all students, including students with disability.

With our next DIAP, to be launched in June 2026, the University intends to build on work begun in the current DIAP. This includes embedding lived-experience voices in the way we go about developing, implementing, and monitoring our DIAP. The Standards should recognise the value of collaborative approaches that involve people with disability in the design and implementation of inclusion initiatives. Linking this to disability action planning could support providers in embedding meaningful engagement with students and staff with disability. This collaborative approach has been key to the success of our own governance work around the DIAP and has enhanced the effectiveness of our accessibility and inclusion initiatives.

Good governance and accountability require reliable data. The [Australian Universities Accord Final Report](#) recognised significant challenges and inconsistencies in the collection of student disability data across the higher education sector.³ There is a need for greater targeted government investment in supporting improved disability data collection across the sector. There is also a need for better data sharing across jurisdictions via various tertiary admissions centres, to enable access to university and smooth student onboarding. This data is critical for supporting effective accountability and better outcomes for students with disability.

Whilst the Standards should remain broad in scope to allow contextual flexibility, providers would benefit from clear guidance on how broad Standards translate into practice for students with high-support needs. The requirement for compliance with other legislation (under Standard 6.2) provides an important baseline, but additional clarity around supports and adjustments for students with disability could assist providers in meeting their obligations effectively and consistently. This would support providers in delivering equitable outcomes for all students with disability.

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.**

Yes, the term ‘emerging technologies’ is adequate.

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

The Standards currently require that risks are managed and mitigated effectively through corporate and academic monitoring and accountability mechanisms within the tripartite management structures across management, Academic Board and Council. TEQSA's regulatory approach is grounded in risk management, requiring providers to evidence risk assessment, management, scrutiny and mitigation for all existing and emerging risks. Whilst the Standards should establish this requirement, they should not prescribe how risks to emerging technologies should be managed. Given that the nature of these risks will evolve, detailed guidance should be developed through other mechanisms such as a Statement of Regulatory Expectation or other TEQSA guidance material, rather than embedded within the Standards themselves.

For academic integrity risks related to emerging technologies, Standard 1.4 on learning outcomes and assessment has proven flexible enough to accommodate the fundamental challenges that new generative AI (GenAI) systems have posed to assessment. Wording here, which focuses on learning outcomes and the University's ability to assure learning, has achieved the right balance between managing risk and allowing for flexibility and diversity of delivery. No changes to this are recommended.

Standard 3.3 on learning resources and educational support may need close review to ensure that equity of access has been considered. At present, unsupervised legitimate learning uses of GenAI tools are unlikely to be significantly enhanced by students' access to paid models compared to those publicly available. Given the prohibitive cost structures of these tools for Australian institutions, it is not recommended that a broad 'equity of access' clause be included in the Standards. However, it is reasonable to ensure that where a tool is required as part of a course of study (such as in assignments and class activities designed to build AI literacy, fluency and skills) access to that tool is provided equitably to all students.

³ Australian Universities Accord Review Panel, *Australian Universities Accord* (Final Report, December 2023), 116-7

Standard 5.2 on academic and research integrity currently includes a list of misconduct types. Many institutions are now adding a 'technology misuse' category to address instances where generative AI tools or outputs have been used inappropriately. Consideration could be given to including this category in the Standard to support consistent sector-wide approaches to this emerging form of misconduct.

The Standards may also need to address the governance implications of autonomous decision-making and agentic systems. As providers increasingly automate administrative processes using systems with embedded AI tools, governance bodies will need to ensure decisions remain explainable and transparent and with appropriate human oversight, and that individuals affected can request a formal appeal. This raises important questions for governance standards, record-keeping, information management and accountability frameworks. Providers should be expected to maintain oversight of automated decision-making systems to ensure they remain subject to meaningful human scrutiny, institutional accountability and prompt review of decisions when required.

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

Standard 1.4 on Learning Outcomes and Assessment provides a good example of a well-written standard. It has enabled the sector to respond flexibly to a fundamental challenge while providing TEQSA with the authority to act on emerging risks. The Standard achieves this by focusing on desired outcomes rather than prescribing specific technologies or approaches.

Amendments to other Standards should follow this model wherever possible. Standards should focus on outcomes and avoid references to specific technologies, challenges or other aspects that could quickly become outdated and unnecessarily restrict provider flexibility. This is particularly important given that the Standards must be appropriate for all provider types. Rather than increasing prescriptiveness, the Standards should establish clear expectations around risk management, allowing providers to evidence how they are managing risks associated with emerging technologies and innovation in ways that align with their institutional context and risk appetite.

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?

A robust, proportionate and evidence-informed cyclical review of the Threshold Standards should draw on established evaluation and review methodologies from academic literature and practice. Given that a five-year review cycle is a relatively short timeframe, the methodology should be designed to capture meaningful change while allowing sufficient time for Standards to embed and demonstrate impact. The review should be proportionate to the scale of potential amendments required, avoiding unnecessary disruption to provider operations while allowing for point-in-time reviews to address specific emerging risks.

Some emerging or evolving risks could also be addressed through TEQSA's other functions, including the development of Statements of Regulatory Expectation and guidance materials, rather than changes to the Standards themselves. TEQSA could also take an educative approach in some instances. Its approach to GenAI serves as a good model. TEQSA engaged in meaningful dialogue with higher education providers, seeking to understand the risks, challenge and opportunities presented by the emerging technology, while also facilitating the sharing of best practice among institutions.

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

Meaningful engagement requires early consultation to allow stakeholders time to prepare substantive responses and shape the focus and scope of the review. Rather than seeking broad feedback on all Standards, the review should identify specific focus areas where evidence suggests amendment may be warranted, enabling stakeholders to provide more detailed responses on areas of genuine concern or change.

The review process must ensure representation from all provider types—including universities, non-university higher education providers, and smaller or specialist institutions—as well as from students, staff, regulators and other key stakeholders. Targeted outreach may be necessary to ensure underrepresented voices are heard. Consultation periods should be sufficient to allow stakeholders to gather evidence, consult internally, and formulate considered responses. This should include webinars and roundtables, as well as formal calls for submissions.

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