



# The University of Queensland's submission in response to amendments to the Higher Education Standards Framework (Threshold Standards) 2021

The University of Queensland (UQ) welcomes the opportunity to provide feedback on the proposed amendments to the Higher Education Standards Framework (Threshold Standards) 2021. This submission addresses several issues of significance to the sector and reflects UQ's commitment to high-quality education, effective governance, and strong student outcomes. We hope the insights contribute constructively to the Panel's deliberations and the refining of the proposed amendments.

Our key recommendations are:

## Commitment to addressing racism

- Require providers to develop and implement whole-of-organisation anti-racism plans that articulate commitments to addressing racism and fostering inclusive, equitable and safe campuses, centre the experiences of Aboriginal and Torres Strait Islander people, and distinguish between general anti-racism obligations and specific responsibilities to Indigenous communities.
- Develop and provide sector-wide guidance on anti-racism, to support providers in meeting strengthened expectations, promote consistency, and reduce duplication of effort.
- Ensure explicit anti-racism standards are clearly defined and integrated within a holistic institutional framework so they complement rather than duplicate or compete with existing equity, diversity and inclusion obligations.
- Avoid rigid or prescriptive definitions of racism, instead focus on why racism is unacceptable and on the actions that institutions are expected to take, while allowing flexibility as understandings and expressions of racism evolve.

## University Governance Principles and transparency requirements

- Apply the Principles across the sector using a hybrid approach: regulatory application for public universities, and guidance-based or educative application for private universities.
- Ensure regulatory reform strengthens accountability while preserving institutional autonomy and avoiding excessive requirements that could undermine institutional capacity or the effective delivery of core educational missions.

## Supporting people with disability

- Make disability inclusion explicit, embedding accessibility as a systemic expectation across the student lifecycle.

- Promote Universal Design while recognising practical limits, including resource implications, the continued role of individual accommodations, and legitimate inherent requirements and secure assessment obligations.
- Require meaningful consultation with people with disability in the development and implementation of standards, ensuring diverse and intersectional perspectives.

## Emerging technologies

- Adopt the term 'contemporary digital tools and technologies' in place of 'emerging technologies' to provide clearer, more durable terminology that is fit for regulatory use.
- Focus regulatory expectations on ensuring graduates can confidently use the digital tools they will encounter in study and the workplace, regardless of whether those tools are newly developed or well established.
- Explicitly require providers to embed contemporary digital tools and technologies, aligned to learning outcomes, while avoiding overly prescriptive or rigid requirements that could constrain innovation, limit adoption of contemporary approaches, or undermine institutional distinctiveness.
- Maintain the HESF's principles-based design while strengthening expectations that courses remain fit for purpose in relation to contemporary digital tools and technologies, allowing for disciplinary variation and preserving academic judgement in course design and assessment.

## Cyclical review of the Threshold Standards

- Adopt a risk-based, evidence-informed and consultative approach to cyclical reviews of the Threshold Standards, focusing on systemic risks to students, quality, and public confidence.
- Design the review process to enable purposeful stakeholder engagement, using consultation methods that capture diverse perspectives.



## Demonstrating a commitment to addressing racism

### *Institution-wide actions to demonstrate commitment to addressing racism*

Higher education providers should be required to develop whole-of-organisation anti-racism plans that articulate an institution's commitment to addressing racism and fostering inclusive, equitable, and safe campus environments. These plans should provide clear, practical frameworks for operationalising commitments; be developed through genuine consultation with students and staff, including Aboriginal and Torres Strait Islander people; and be tailored to each university's context and risks. They must centre the experiences of Aboriginal and Torres Strait Islander peoples and distinguish between general anti-racism obligations and the specific responsibilities owed to Indigenous communities.

To support meaningful action, institutions need staffing structures capable of delivering these commitments. Dedicated EDI teams with explicit anti-racism expertise play an essential role. Embedding this expertise within broader EDI structures helps ensure intersectionality is not overlooked. However, responsibility and accountability for anti-racism work must be shared across all parts of the university. Racism should also be recognised as a material institutional risk within risk management and reporting frameworks, with transparent reporting on incidents and actions taken.

All staff, including casual teaching staff, should receive mandatory foundational anti-racism training aligned to national frameworks, anti-discrimination law, and institutional policies. This training should build understanding of racism, discrimination, intersectionality, and the systemic impacts of racial harm. It should equip staff to recognise, respond to, and report racism through culturally safe complaints mechanisms. Universities must ensure such mechanisms are trusted, accessible, and fit for purpose.

### *Targeted sector-wide guidance*

Sector-wide best practice guidance would help providers meet strengthened anti-racism expectations. The *Racism@Uni* report already offers practical recommendations, and developing shared guidance would reduce duplication and support consistent implementation. Access to reliable, standardised demographic data, including race and cultural background, is critical to measuring progress and enabling meaningful intersectional analyses.

### *Principal benefits and potential limitations of explicit anti-racism standards*

Explicit anti-racism standards shift institutions from a passive "not racist" position toward proactively identifying and addressing racism. They require targeted actions with measurable outcomes, distinct from broader diversity or wellbeing initiatives, ensuring providers take clear and accountable steps.

Potential limitations include duplication with existing frameworks or additional administrative burden. To mitigate this risk, explicit standards should complement, rather than compete with, established EDI obligations and remain clearly defined within a holistic institutional approach.

Overly rigid definitions of racism can also be counterproductive, risking politicised debates and limiting constructive dialogue. Standards should focus on why racism is unacceptable and what institutions must do to address it, while remaining flexible as understandings and expressions of racism evolve.

A further limitation is that effectively implementing explicit anti-racism standards is resource-intensive. It should be recognised that universities require adequate staffing, expertise, and funding to respond to evolving social issues, including racism, gender-based violence, and other ongoing EDI priorities.



## Incorporating the Governance Principles and transparency requirements

### *Application to public and private universities*

While there are advantages in applying the University Governance Principles consistently across all types of universities, differences in size and scale may justify a tailored regulatory approach for private providers. However, public confidence in the sector and the interests of students are shaped by the conduct of both public and private providers. A possible way forward is a hybrid model: apply the Principles as regulatory requirements for public universities, and adopt a guidance or educative approach for private universities. This could help support consistency across the sector while recognising differences in scale and operating context.

### *Impact of strengthened standards on student outcomes and experience*

UQ is committed to rigorous academic oversight, staffing profiles that meet HESF and professional accreditation requirements, and excellence in teaching quality. These are foundational to a strong student experience. We consider that the existing HESF standards already require this of registered providers, and that institutions engaging seriously with their Domain 3 and Domain 5 obligations are systematically addressing these matters.

We are not opposed to greater specificity in the standards where it would sharpen accountability and clarify regulatory expectations. However, any reform should also respect institutional autonomy and recognise the legitimate variation in how institutions organise academic oversight and assure teaching quality.

The cumulative impact of concurrent reforms warrants careful consideration. The proposed HESF changes, ATEC mission compacts, the National Higher Education Code to Prevent and Respond to Gender-based Violence, TEQSA modernisation, and the Governance Principles each introduce additional reporting and governance requirements. While each initiative is individually defensible, their combined effect risks placing significant pressure on institutional capacity in ways that may detract from the educational mission they are intended to support. Close attention to transition arrangements, sequencing, and the overall coherence of the regulatory framework would therefore be beneficial.

## Supporting people with disability in higher education

### *Inclusion, universal design and inherent requirements to improve equity, accountability and student outcomes*

UQ supports the proposed themes of inclusion, universal design and inherent requirements, as they align with our existing commitments and ambitions and have the potential to foster a more inclusive and equitable higher education system with improved student outcomes. Strengthening standards to make disability inclusion explicit, rather than implicit, embeds accessibility at a structural and systemic level, creating a learning and working environment that is accessible for all.

Meaningful consultation with people with disability is essential, reflecting the principle of “nothing about us without us.” Consultation should include a diverse range of voices and actively amplify those who are most marginalised, taking an intersectional approach that reflects the communities impacted.

The increased adoption of Universal Design for Learning (UDL) can reduce reliance on individual adjustments, easing administrative burdens on university support teams and enabling them to focus on proactive, wrap-around support for students with disability. However, several challenges must be acknowledged. Implementing UDL effectively requires significant time, expertise and resourcing, and there is a risk of unrealistic expectations that all barriers can be anticipated or removed, when in practice some students will continue to require individual accommodations.

If not carefully framed, UDL may also be interpreted as implying that all course requirements are adaptable, which can conflict with legitimate inherent requirements related to safety, professional practice or learning outcomes. At the same time, it is essential that inherent requirements are understood as achievable with appropriate support, to avoid denying students the reasonable accommodations to which they are entitled. Further tensions arise in balancing UDL with secure assessment policies, which can introduce specific obligations that sometimes conflict with UDL principles promoting flexibility and student choice in how students learn and demonstrate their knowledge.

The regulatory framework should explicitly acknowledge and address these tensions to support balanced, workable and inclusive practice. It is also recommended that Universal Design principles be applied broadly — beyond the classroom — to inform policy and practice, including physical and digital environments as well as assessment design.

Embedding these themes into standards can also drive improvements in accountability, governance and provider practice. By explicitly including disability considerations, universities can systematically remove barriers and support students across all stages of the student lifecycle — from pre-access through to transition-out. This aligns with the Disability Support Program's (DSP) move to a needs-based funding model, which focuses on equitable outcomes and should be reinforced through alignment with schools and workplaces. Effective implementation requires institutions to have sufficient time and resources to introduce progressive, sustainable changes and evaluate their impact.

## Responding to emerging technologies in the Threshold Standards

### *Terminology and scope*

The term 'emerging technologies' is widely used but is not well-suited to regulatory contexts. It emphasises novelty and early-stage adoption, positioning institutions as continually reacting to what is new rather than focusing on what students must be able to use now. In practice, many digital technologies are already deeply embedded in teaching and assessment, student support, decision-making, quality assurance and institutional governance. Framing the issue only in terms of 'emerging technologies' can therefore under-represent the systemic impact of digital change across the student lifecycle. It also shortens the longevity of regulatory language, as tools move rapidly from emerging to standard practice.

Effective regulation should instead focus on ensuring students can confidently use the digital tools they will encounter in study and the workplace, whether those tools are new or well established.

Terminology that emphasises impact, integration and risk, rather than novelty alone, is more likely to support effective regulation in a rapidly evolving digital environment. A term such as 'contemporary digital tools and technologies' provides a clearer and more durable framing. It anchors an institution's obligation in the present, signals currency rather than speculation, and encompasses the full ecosystem of tools that characterise today's professional workplaces. The phrase 'contemporary digital tools and technologies' also aligns more naturally with the language of the HESF, which requires engagement with current knowledge and advances in practice (Standard 3.1.2) and with the knowledge and skills required for employment (Standard 1.4.2c).

### *Managing risks related to emerging technologies*

There is value in explicitly referencing a requirement for providers to embed contemporary digital tools and technologies, aligned to learning outcomes, within the Standards Framework. However, care is needed to avoid overly specific or rigid requirements that could constrain innovation, hinder the adoption of contemporary approaches, or diminish institutional distinctiveness.

Although the HESF contains significant guidance on managing risks associated with technology, much of it is implied rather than explicit. For example:

- Standard 3.1.2. provides that course design should incorporate 'advanced knowledge and inquiry', 'current knowledge and scholarship', 'emerging concepts... and, where applicable, advances in practice'.
- Standard 1.4.2 requires learning outcomes to include the 'knowledge and skills required for employment'.
- Standard 5.3 provides that regular reviews should consider the 'emerging developments in the field of education, modes of delivery, [and] the changing needs of students'.

Collectively, these provisions create a strong incentive for providers to incorporate contemporary digital tools and technologies into courses of study. Regulatory expectations are further underscored by TEQSA's recent actions, including the July 2024 request for institutional action plans on generative AI, which indicates an expectation that providers engage actively and systematically with new digital capabilities.

While the existing standards can be interpreted to require this engagement, a more explicit reference would provide clearer expectations and stronger assurance. It would enhance regulatory and public confidence by articulating the requirement directly.



### *Preserving provider flexibility and supporting innovation*

The HESF's principles-based design was a deliberate policy choice to avoid over-regulation and preserve institutional autonomy. The strength of this approach can be maintained while placing greater emphasis on ensuring courses remain fit for purpose in relation to contemporary technologies. Any approach should allow appropriate variation across disciplines and programs, with academic judgement central to assessing how technology is integrated into course design.

One option would be to include a standard requiring providers to design courses with current tools and technologies in mind and to review the impact of technological change regularly. For example, a new clause — such as 3.1.6 in Domain 3 (Teaching) — could state: 'Each course is designed to develop students' capability to engage with contemporary digital tools and technologies relevant to the field of education or discipline, and is reviewed regularly to ensure that learning outcomes and assessment practices remain appropriate in light of technological change'.

Providers would retain responsibility for determining how digital capability is developed and assessed within each program, consistent with institutional autonomy and disciplinary or professional requirements. This reflects the reality that the digital capabilities needed by graduates differ across fields of education. Accordingly, providers should determine the most appropriate approach based on the course learning outcomes, the employment context, and the level and volume of the course of study.

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

### *Methodological approaches to ensure a robust, proportionate and evidence-informed review*

The cyclical review of the Threshold Standards should use a risk-based and proportionate approach. It should focus on standards where there is credible evidence of systemic risks to students, quality, or public confidence, drawing on multiple sources such as regulatory insights, national data, and findings from past reviews. This helps ensure the review concentrates on areas that matter while avoiding unnecessary changes to standards that are working well.

The review process should include targeted consultation with the sector and consider regulatory burden and any unintended consequences. Consultation should be based on clear evidence and well-defined problems, distinguish between issues with the standards themselves and their application, and consider how impacts may vary across provider types. Any proposed amendments should be benchmarked against international quality assurance practice, checked for consistency with Australian legislation, and supported by transparent reasoning and follow-up evaluation to ensure they address real risks without adding unnecessary complexity or compliance costs.

### *Engaging diverse stakeholders meaningfully*

A review process should engage stakeholders in purposeful and accessible ways, beginning with a clear explanation of the purpose, scope, and the evidence-based problems under consideration. Stakeholder engagement should use a mix of consultation methods to reach different groups. Targeted engagement with providers of different sizes and missions, students, peak bodies, professional accrediting bodies, and staff groups ensures diverse perspectives are heard without relying on a single, uniform approach.

Meaningful engagement is strengthened by staging consultation over time and creating feedback loops that show how input has been considered. It is also important to distinguish feedback on the design of the Threshold Standards from issues more appropriately addressed through regulatory practice or guidance. Using plain language, allowing sufficient time for thoughtful responses, and offering both written submissions and interactive forums can improve the quality and inclusiveness of engagement, while building trust in the process and its outcomes.