



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

Submission by the University of Technology Sydney



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# Introduction

The University of Technology Sydney (UTS) thanks the Higher Education Standards Panel for the opportunity to provide a submission in response to the consultation on amendments to the Higher Education Standards Framework (Threshold Standards) 2021. UTS supports the Panel's commitment to a transparent and inclusive consultation process on these important and timely reforms. This submission focuses on priority issues and high-level observations, and we would welcome the opportunity to contribute further as the reform process progresses.

As a member of Universities Australia and the Australian Technology Network of Universities, we also broadly support the observations and recommendations made by those peak bodies.

## 1. Demonstrating a commitment to addressing racism

Addressing racism in universities is clearly a priority given findings of recent research including from the Australian Human Rights Commission (*Respect at Uni: Study into antisemitism, Islamophobia, racism and the experience of First Nations people*), and Special Envoys on Antisemitism and Islamophobia. UTS supports the Australian Government's commitment to strengthening higher education regulation to make antiracism requirements explicit, consistent, clear and ensure accountability across the sector and with a focus on culture change.

To ensure meaningful progress, the government should prioritise practical, outcome-focused measures that empower universities to address racism effectively at a local level. Rather than increasing regulatory requirements that risk consuming vital resources, policy should facilitate and incentivise direct actions—such as the development and implementation of targeted anti-racism strategies, capacity building, and ongoing evaluation. Supporting universities to tailor their responses to their unique contexts will drive genuine cultural change and better outcomes for students and staff.

As of February 2026, eleven Australian universities (including UTS) had already prioritised anti-racism activities through establishing standalone policies or strategies (AHRC, 2026). These actions provide a useful foundation from which the broader sector can learn and build.

### UTS's response to consultation question 1

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

UTS takes the view that meaningful, institution-wide commitments to addressing racism must be anchored in structures that are strategic, transparent, and sustainable, while avoiding unnecessary administrative burden. To achieve this, we recommend that higher education providers be required to:

#### 1. Adopt flexible, context responsive antiracism sector benchmarking frameworks

A model similar to the [Welcoming Universities Standard](#), of which UTS is also a member, offers a practical approach that balances accountability with adaptability. It allows universities to set their own benchmarks—based on institutional context, needs and resourcing—supporting genuine improvement without creating excessive reporting requirements. The Standard aims to foster a culture of welcome and belonging in participating Australian universities and provides a framework for member institutions to:

- Improve existing cultural diversity and inclusion initiatives and strengthen their impact and relevance for the university community.
- Recognise the importance of embedding cultural safety and humility within university policy and practice.
- Create mechanisms for benchmarking and assessing impact.
- Strengthen curriculum-informed prevention approaches
- Lead research and praxis in the social inclusion space.
- Enhance the profile of desirable higher education destinations for prospective students and sought-after employers for professionals.

- Foster an enhanced public reputation in the community.
- Identify opportunities for shared learning and positive connections across university divisions.
- Encourage conversations about how universities can foster and build networks to improve inclusion and belonging.

An alternative model would be to require universities to adopt a set of targets in relation to cultural diversity and anti-racism that respond to their individual context. The model recently adopted by the [Workplace Gender Equality Agency](#), requires employers to select and commit to achieve 3 targets from a menu of 19 options. At the end of 3 years, they need to meet or demonstrate improvement against each target selected. Such a model recognises that organisations face significant variations in context and may be starting anti-racism action from very different

2. Embed anti-racism commitments within existing whole of institution strategies and frameworks

Many universities already participate in institution wide culture change programs such as Athena Swan. Ensuring these programs explicitly include antiracism criteria would integrate the work into existing priorities and established governance mechanisms, not as an 'add-on' but as an integral part. This approach also avoids the duplication of governance processes and ensures antiracism is seen as part of broader equity, governance, and cultural change efforts.

3. Demonstrate transparent leadership commitment and regular review cycles

Universities should be required to publish an anti-racism statement or strategy (endorsed by senior leadership), conduct periodic reviews, and share high-level findings to promote transparency. Regular engagement and consultation with students and staff should be a requirement for seeking feedback on progress and priorities, uncovering emerging issues, and ensuring interventions are effective.

4. Allocate meaningful resourcing to anti-racism capability and initiatives

Evidence of commitment should include adequate funding, professional learning, culturally safe reporting systems, and realistic workload allocation.

## UTS's response to consultation question 2

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

- Sector-wide adoption of common key principles and standards such as those articulated in the Welcoming Universities Framework.
- Development of practical toolkits and/or templates. Areas in which guidance would be particularly valuable include:
  - Establishing Anti-Racism Groups within universities to draw on the expertise of staff and students with lived experience, with members receiving formal recognition including adequate remuneration or workload allocation for staff who are not already paid for this work.
  - Leading practice in trauma informed and culturally safe disclosure and complaints processes
  - Developing and embedding culturally inclusive and antiracist curriculum and teaching practices
  - Successful workforce diversity initiatives, particularly those focused on developing culturally diverse leadership
  - Mechanisms for sharing of exemplary practice through case studies. Financial support from the Commonwealth for this kind is provided to ADCET (the [Australian Disability Clearinghouse on Education and Training](#)) which already provides an effective model.

## UTS's response to consultation question 3

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

Explicit anti-racism standards need to be stand alone, separate from existing wellbeing and equity standards in order to emphasise accountability and preventative action centred around racism specifically. A key concern about simply including antiracism activities with other standards is that in a period of

financial uncertainty and significant reform in the sector, universities will choose to only take action on areas that are considered higher risk or more critical (for example gender-based violence). Such issues must not compete.

It is also critical that university systems and processes while specifically recognising and responding to the harms of racism, reflect standards that explicitly consider impact of intersectionality both in prevention as well as reporting. Racism, like other forms of unlawful discrimination and prejudice, is fundamentally based on power imbalances that are frequently amplified for people with intersecting marginalised identities.

It is also important to note that reporting of complaints data can be important, it often does not accurately reflect the extent of actual racist experiences among different cohorts of staff and students or the nuance of those experiences which can inform better practice. Including intersectional analysis into student satisfaction/wellbeing/engagement surveys using perceptions of inclusion and belonging, can offer greater insight into how racism presents within organisations.

In order to do this, any standards introduced should emphasise the need for data collection that considers cultural identity as well as other intersecting demographics

Benefits could also include:

- Focused attention by making anti-racism a clearly defined priority for the sector rather than something indirectly referenced through broader equity or wellbeing frameworks.
- Greater sector consistency by ensuring that all universities—not only those with local champions— address racism as a core responsibility.
- Improved experiences for students and staff by setting clear expectations about everyday experiences in teaching, learning, recruitment, promotions, curriculum design, and campus culture.
- Alignment with national and global expectations—Australia’s diverse tertiary education sector and globally focused aspirations benefit from standards that reflect global best practice on equity, inclusion, and social justice.

Potential limitations include:

- Risk of increased administrative burden and potential for performative compliance. If not designed carefully, explicit standards could create an excessive reporting burden, diverting time and resources away from genuine community engagement and cultural transformation. This could lead to performative compliance rather than meaningful change.
- Tokenism or superficial implementation. Without proper guidance and resourcing, some institutions may treat anti-racism as a ‘tick-box’ exercise.

Overall, the benefits outweigh the limitations when explicit standards are aligned with existing frameworks and designed to minimise administrative duplication.

## 2. Incorporating the Governance Principles and transparency requirements

### UTS’s response to consultation questions 4 and 5

The principles outlined in the University Governance Principles (the Principles) provide a strong foundation for uplifting university governance to address current and future challenges. UTS supports the decision of Education Ministers for the Australian Government to commence embedding the principles in the Higher Education Standards Framework and welcomes the introduction of a new Part C to the Threshold Standards. Clear, sector-wide expectations will assist in reducing ambiguity and support more consistent governance practice across public universities.

At UTS, we have begun to proactively and transparently undertake work to give effect to the Principles. Our Chancellor, Michael Rose AM, recently communicated to the UTS community that he has begun to engage UTS Council on these issues, and they have agreed on a number of changes which can be implemented fairly quickly as mechanisms to give effect to the Principles. These will include:

- An independent review of governance to be commenced in the first half of this year.

- Changes to the remit and membership of some of the Council's sub-committees.
- The establishment of a new People and Culture sub-committee.

However, there are risks associated with standards that apply only to public universities. A differentiated framework may increase regulatory complexity for dual-sector institutions or those operating across multiple jurisdictions in partnership arrangements. Care will be needed to ensure that additional or differential requirements do not result in excessive administrative burden or encourage compliance-driven, rather than outcomes-focused, governance practices.

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

UTS broadly supports HESP's proposal to amend the Threshold Standards to explicitly embed inclusion-affirming practice. We agree that such amendments would benefit all students, not only students with disability.

We recognise that strengthened inclusion requirements would also have implications for work-integrated learning (WIL). But as a student-centred university, UTS prioritises inclusive learning that prepares students for professional contexts and we are confident that we are well placed to respond through our strong industry partnerships and precinct-based model to ensure WIL opportunities are accessible, inclusive and educationally meaningful for all students.

#### UTS's response to consultation questions 6 and 7

The themes within the consultation paper involving inclusion, universal design and inherent requirements provide a foundation on which to challenge internal and external ableism facing these groups.

However, research has shown these issues are still being dealt with through ad hoc processes rather than systemic approaches that challenge ableism within the system (see references 1-3). Recent initiatives at UTS to promote disability led research (UTS Disability Research Network) and representation of employees with disability illustrate the importance of creating avenues for disability leadership to emerge from staff and students ranks to ensure accountability across all areas of built, digital, and educational environments (see the work of the Accessible Environments Advisory Group established under UTS's [Accessibility and Inclusion Policy](#)).

Disability led initiatives from within universities do provide authentic application of universal design, inclusion strategies and understandings of inherent requirements that are seen from an insider's perspective. They also generate insights that drive cultural change and offer transformative solutions. The COVID19 pandemic demonstrated this potential, despite the significant disruption, higher education rapidly implemented systemic improvements to access and inclusion. Application of universal design, flexibility in delivery, use of accessible and inclusive software, and an overhaul of accessibility requirements for subject delivery led to rapid, sector-wide change in a short period of time. Online and hybrid environments delivered greater "equality of experience", with inclusive provisions introduced for students with disability also benefitting students without disability, those from culturally diverse backgrounds and international students (e.g. captioning, transcripts, electronic provision of coursework ahead of time).

The Higher Education Standards Panel has the opportunity now to embed this approach by ensuring staff and students with disability are actively engaged at all stages of the process to help bring about sustainable change.

- Cook, P. S., Thorneycroft, R., Humphrys, E., Asquith, N. L., Stafford, L., Thomson, M. J., ... & Korobacz, R. J. (2026). Disabled and academic: a collaborative autoethnography on ableism and cruel optimism within Australian higher education. *Journal of Further and Higher Education*, 1-17. This paper explores the experiences of those working in academia as lecturers and researchers, as drawn from the disabled academics on the author team.
- Yerbury, H., Darcy, S., Burridge, N., & Almond, B. (2024). Are we talking the same language? Contestable discourses between university staff accommodating students with disability. *Disability & Society*, 39(6), 1359-1379. This paper explores the work knowledges of those involved with the implementation of the processes of granting learning accommodations: the disability services staff and the academic staff liaison officers.
- Yerbury, H., Darcy, S., Burridge, N., & Almond, B. (2022). Bringing order or creating exclusion: systems for managing disability in a university. *Journal of Documentation*, 78(3), 529-545. This study explores how students with disability enrolled in a university and their experience with the systems intended to facilitate their studying "on the same basis" as students without disability.

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

### UTS's response to consultation question 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.**

UTS supports the use of the term 'emerging technologies' as defined in the Scottish Government's Review of Emerging Technologies referenced in the consultation paper, as it provides a broad and flexible definition that can accommodate new and evolving digital tools without requiring constant revision of the standards.

### UTS's response to consultation question 9

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

The current Threshold Standards implicitly address technology-related risks through high-level, principles-based clauses covering risk identification, academic integrity, quality assurance, staff capability and information management — emerging technologies fall within scope where they create foreseeable risks in these areas

However, the absence of explicit reference to emerging technologies risks, variable interpretation and inconsistent practice across the sector, limiting regulatory clarity and TEQSA's ability to monitor compliance effectively.

Given TEQSA's own announced shift toward a regulatory-led approach for GenAI, explicit standards would better align the Framework with current regulatory expectations and provide providers with clearer guidance.

### UTS's response to consultation question 10

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

UTS supports a principles-based approach that explicitly anchors emerging technology risks within existing governance and academic assurance clauses, without introducing prescriptive requirements that could inadvertently constrain institutional innovation or homogenise approaches where diversity of responses are required to cater for each university's specific requirements.

Amendments should require governing bodies to demonstrate active oversight of emerging technology risks within institutional risk management frameworks, while leaving institutions discretion in how those risks are identified and managed.

Standards should be technology-neutral where possible, focusing on outcomes such as equity, integrity and data security rather than specific tools or platforms, ensuring the Framework remains durable as technologies evolve.

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

UTS is broadly supportive of the *Universities Accord (Australian Tertiary Education Commission) (Consequential and Transitional Provisions) Bill 2025* before Parliament, but shares the concerns outlined by Universities Australia that the Bill does not clarify the future of the HESP or explain how sector trust will be maintained if responsibility for the Standards shifts to staff in the Australian Tertiary Education Commission (ATEC).

## UTS's response to consultation question 11

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

- Reviews should be grounded in evidence drawn from TEQSA regulatory data, sector performance metrics, student outcome data (including QILT), and findings from relevant inquiries and audits to ensure amendments are proportionate and justified
- Adopt a risk-based review framework that prioritises areas of demonstrated concern or emerging systemic risk, rather than undertaking wholesale revision of standards that are functioning effectively
- Each review cycle should include a formal scoping phase that assesses which domains require attention, drawing on TEQSA's compliance and monitoring intelligence alongside academic research
- Establish clear evaluation criteria upfront, including student equity, provider diversity, and regulatory burden, to assess the impact of proposed changes before finalisation
- Build in a post-implementation review mechanism between scheduled five-yearly reviews to monitor whether amendments are achieving intended outcomes and to address urgent emerging issues

## UTS's response to consultation question 12

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

- Establish a tiered engagement model that includes structured consultation with peak bodies (e.g. Universities Australia, TAFE Directors, student unions) alongside targeted outreach to underrepresented voices such as students with disability, First Nations students, and casual academic staff
- Publish draft proposed amendments openly and provide sufficient lead time (minimum 8 weeks) for considered submissions, with plain-language summaries to support participation beyond specialist policy audiences
- Convene discipline and sector-specific roundtables, including industry, professional accreditation bodies, and community organisations, to capture impacts across diverse delivery contexts
- Close the feedback loop by publicly reporting how stakeholder input has been considered and where it has or has not shaped final recommendations, building trust and encouraging ongoing engagement