



**CONSULTATION ON AMENDMENTS TO THE HIGHER EDUCATION
STANDARDS FRAMEWORK (THRESHOLD STANDARDS) 2021**

Western Sydney University Feedback

Western Sydney University (WSU) welcomes the opportunity to provide feedback to the Higher Education Standards Panel on potential amendments to the *Higher Education Standards Framework (Threshold Standards) 2021*. We engaged with a range of university stakeholders for this submission.

For the Panel's consideration, the following feedback is provided by WSU, structured to align with the thematic areas posed within the Consultation Paper:

Demonstrating a commitment to addressing racism

The 2026 *Respect@Uni* report demonstrates that racism within Australian higher education is entrenched, systemic, and continues to undermine the safety, wellbeing, and educational outcomes of students and staff - particularly Aboriginal and Torres Strait Islander peoples. These findings show that institutional responses remain overly reliant on policy statements and values-based rhetoric rather than embedding measurable, accountable, whole-of-institution antiracism practice. The scale and severity of the reported experiences; including widespread interpersonal racism, diminished trust in institutions, exclusion from opportunities, and significant mental health impacts - highlight that existing approaches are inadequate and place an undue burden on those experiencing harm. Addressing these challenges requires universities to adopt clear, accountable antiracism strategies within Domain 2 (2.2 Diversity and Equity), ensuring safe and equitable learning environments specifically for First Nations students.

To meet these challenges, the Threshold Standards must move beyond documentation-focused compliance and require demonstrable, institution-wide antiracism strategies anchored in structural change. This involves establishing independent and accessible complaints mechanisms with clear escalation pathways, building antiracism capability across all staff, auditing curricula for cultural inclusion, and setting regulatory expectations supported by minimum datasets, standardised reporting mechanisms, partner due-diligence requirements, and exemplars of effective practice. Embedding expectations for employing Indigenous academic and professional staff, supported by discipline-specific Indigenous teaching and learning professional development, is essential to ensure that antiracism capability is not incidental but integral to institutional culture and accountability.

Given the disproportionate and well-documented impacts on First Nations peoples, the Threshold Standards must explicitly require culturally safe learning environments and meaningful institutional responsibility. This includes addressing the expectation frequently placed on First Nations students to speak for, or educate, non-Indigenous peers and ensuring their voices inform systemic responses rather than being relied upon as the mechanism for reporting and resolving racism. Whole-of-institution antiracism strategies; with named accountabilities; measurable outcomes; regular evaluation; accessible complaints pathways; curriculum-level auditing; and consistent reporting, are necessary to shift responsibility from individuals who experience racism to the institutions responsible for preventing it and responding to it effectively.

Incorporating the University Governance Principles and transparency requirements

The proposal to introduce a separate Part C applying exclusively to public universities risks fragmenting the coherence and universality of the Higher Education Standards Framework (HESF). Such a distinction would create perceptions of unequal regulation, undermine competitive neutrality, and introduce additional compliance burdens for public institutions already operating under significant financial and reporting pressures. A more effective and equitable approach is to strengthen governance expectations across all providers—rather than creating parallel frameworks—to ensure the sector maintains consistency in quality assurance, transparency, and institutional accountability.

Strengthened governance requirements should focus on demonstrable outcomes rather than procedural compliance. This includes reinforcing clear expectations for academic oversight, staffing profiles, teaching quality, and transparent assessment of governance impacts arising from restructures through existing mechanisms rather than new reporting layers. Consistent with Senate Inquiry Recommendation 5, requiring academic boards to undertake annual reviews would provide a streamlined, high-impact mechanism for supporting robust academic governance and continuous improvement. As part of these strengthened expectations, Domain 6 (6.2 Corporate Governance) should explicitly embed Indigenous representation within governance committees and bodies, ensuring decisions reflect the diversity of university communities and building on national guidance recommending greater inclusion in governance structures.

The Expert Council on University Governance Report (2025) highlights the critical importance of diversity and inclusion in strengthening governance capability and institutional legitimacy. Embedding a requirement for Indigenous representation within governance structures must be supported by sector-wide professional development on Indigenous leadership and cultural load to ensure that representation is meaningful and sustainable. Incorporating these expectations into strengthened governance standards would help ensure that universities are culturally informed, accountable, and better positioned to respond to the needs of First Nations students, staff, and communities, while preserving a coherent, sector-wide regulatory framework.

Supporting people with disability in higher education

Embedding explicit obligations for inclusion, universal design, and inherent requirements in the Threshold Standards would drive a system-wide shift from reactive, disclosure-dependent adjustments to proactive, barrier-free design. These expectations must be operationalised at the subject and course level to influence real teaching, assessment, and placement practices. Universal design benefits not only students with disability but also students from non-English-speaking backgrounds, students balancing complex work and care commitments, and those with undiagnosed conditions. The Threshold Standards should make this broader benefit explicit and treat inclusion as a core institutional responsibility rather than a discretionary cost.

Current inconsistency in defining and communicating inherent requirements creates real risk for students making high-stakes enrolment decisions. Regular review and transparent publication of inherent requirements, grounded in universal design principles, should be mandated. Given ongoing institutional restructures, governing bodies must demonstrate that disability support capacity is monitored and adequate. Modernising language in the Threshold Standards is essential; “special needs” and similar terms reflect a deficit framing inconsistent with rights-based inclusion and should be removed. Clear, contemporary language will reinforce the cultural and structural change these amendments seek to embed.

Emerging technologies and the Higher Education Regulatory Framework

The term “emerging technologies” is too broad for regulatory precision. WSU recommends adopting “digital and emerging technologies” or “digital and generative AI technologies” to reflect the scope and nature of the technologies transforming higher education. While the Threshold Standards remain technology-neutral by design, explicit governance requirements

are now essential. International regulatory approaches demonstrate the value of regulating governance principles (not technology choices) by mandating transparency, safety, equity oversight, and accountability while preserving institutional flexibility and innovation.

The Threshold Standards should differentiate between distinct technology-related risks: academic integrity and assessment validity; student data governance and privacy; equity of access and digital capability; and operational and research integrity. Each requires a different governance response. Institutions should be required to demonstrate that governing bodies oversee educational, ethical, and equity impacts; that student-facing AI tools undergo equity impact assessment; that staff and student input is structurally embedded into AI adoption decisions; and that data governance, privacy, and cybersecurity obligations are explicitly mapped and met. Institutions must also evidence investment in staff and student AI capability, not through mandatory training modules alone, but through curriculum design, professional development, and academic governance processes.

Approach to a cyclical review of the Threshold Standards

A rigorous cyclical review must assess whether the Threshold Standards are delivering their intended outcomes, i.e., student safety, quality, inclusion, integrity, not whether providers have produced compliant documentation. The review should be risk-based and outcomes-focused, using mixed methods, including longitudinal sector data, provider case studies, and TEQSA assurance meta-analysis. Each Domain should adopt a clear logic model with defined evaluation questions, evidence thresholds, and impact metrics, including unintended consequences and compliance burden. Regulatory sandboxes should be used to pilot novel requirements such as governance transparency or digital technology controls, and external peer review should be used where interpretation is contested. Regular 12 to 24-month post-implementation reviews, and a mechanism for urgent interim amendments, are essential to maintain relevance in a rapidly changing sector.

Meaningful engagement must reflect the same inclusion and accessibility requirements imposed on providers. Consultations should be co-designed, multimodal, and supported by plain-language materials and transparent feedback loops that explain how stakeholder input shaped outcomes. Deliberately recruited student panels, representing low-SES, First Nations, disability, CALD and regional cohorts, are essential, as are practitioner roundtables involving disability advisers, student services staff, and other student-facing professionals. Regional and community engagement must be prioritised, and a standing reference group of students, equity experts, disability advocates, industry bodies, and regulators should guide the process. All amendments should undergo structured equity impact assessment to identify differential effects across student populations and provider types.

Final comments

WSU supports amendments that strengthen institutional accountability, advance equity, and ensure the Threshold Standards drive measurable improvements in student experience and academic quality. The recommendations provided are intended to support a regulatory framework that is rigorous, proportionate, future-focused, and capable of lifting performance across the sector.

We trust that this advice will support the Higher Education Standards Panel in delivering a modernised, coherent, and effective Standards framework that meets the needs of current and future learners.

APPROVED:



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10 March 2026