

Effectiveness of the HESF in relation to student support

08 February 2024

Universities Australia (UA) welcomes the opportunity to provide feedback on the Higher Education Standards Panel (HESP)'s review of the effectiveness of the Higher Education Threshold Standards (HESF) and the higher education regulatory framework in relation to student support.

UA is the peak body representing Australia's 39 comprehensive universities. Together, they educate around one and a half million students each year, undertake significant research and development activities, and engage globally to grow Australia's and the world's knowledge base while supporting our nation's economic and social wellbeing.

Introduction

UA acknowledges the stated remit of this review as being distinct from the Higher Education Support Amendment (Response to the Australian Universities Accord Interim Report) Bill 2023. However, clarity on the regulatory responsibilities of the Department of Education and TEQSA, including the intersection of authorities, should be resolved to avoid contrasting assessments, and should clearly articulate the boundaries of responsibilities and powers.

In response to a 2017 review of the HESF by Deloitte Access Economics, the government noted (p.2) that "TEQSA's purpose is to safeguard student interests and the reputation of Australia's higher education sector by assuring the quality of higher education through a proportionate, risk reflective approach that allows higher education providers to pursue their individual missions and encourages diversity, innovation and excellence".¹ This purpose should similarly underpin the intent of any related policy and regulatory condition. Specifically, there are questions around accreditation, the imposition of conditions, and the regulation of student issues for the sector that should be clarified by this review.

These key issues must be resolved for the stability of the sector as well as for ensuring students receive the best possible communication and support from universities and the government. Resolving this discrepancy between regulatory authorities and how the HESF – the regulatory and compliance mechanisms – relate to the Support for Students Policy and amendments to HESA, must be a priority of this review. Part of this resolution should also acknowledge the significant external factors that affect students, which include financial pressure, stress, wellbeing issues etc. Each of these, and others, all contribute to a student's decision to continue or discontinue their studies, and many of these factors may, at times, be beyond the scope of a provider to resolve.

Accordingly, any discussion around higher education governance should be considered within the broader context of governance reform and recommendations arising from the Universities Accord and other major reviews impacting the sector.

The Threshold Standards (2021)

UA emphasises the fit-for-purpose nature of the HESF in relation to support for students. This finding was also articulated in the legislated *'Review of the impact of the TEQSA Act on the higher education sector'* (Deloitte, 2017). Whilst it did not consider the detail of the HESF, the report (2018, pg. ii) nonetheless highlighted that, "Broadly, this Review finds the [TEQSA] Act is operating effectively and as intended".

¹ [Review of the impact if the TEQSA Act on the higher education sector | Australian Government response](#)

As the Department would be aware, TEQSA was never set up as a dispute resolution authority for individuals. Any student complaint reported to TEQSA is handled solely within the scope of TEQSA's review of a provider's (re)accreditation or via other regulatory processes. Where complaints have been made against a provider, TEQSA may investigate the provider for compliance issues and may impose a condition on the provider's status. These conditions vary depending on the circumstances of the investigation and complaints made against the provider. This is the regulatory process through which TEQSA is legislated to operate. Accordingly, individual complaints, particularly if many such complaints are made on a similar issue, factor into TEQSA's assessment of a provider's status. These complaints are not acknowledged or resolved individually.

The present issue concerning the fit-for-purpose nature of the HESF regarding support for students may stem from a misunderstanding of TEQSA's remit and authority to investigate certain issues. This remit is not a design flaw but an intentional mechanism of ensuring the regulator can adequately assess a provider on the basis of the provider's fulfillment of its obligations under the TEQSA Act. Individual complainants that seek specific outcomes can already pursue resolution through State and National Ombuds and, where appropriate, the Australian Appeals Tribunal (AAT) and Human Rights Commission.

Ensuring students are aware of the complaints mechanisms are available, consistent with the Support for Students Policy, will help achieve the desired outcomes.

Key Recommendations

- Consider higher education governance within the broader context of governance reform and recommendations from major sector reviews, such as the Universities Accord.
- Ensure alignment between government authorities and regulators.
- Consider improved government support for non-regulatory good practice sharing that enhance institutional objectives and engagement with provider activities, building on the success of the former Office of Learning and Teaching.
- Clarify, in policy development and implementation, the distinction between internal and external factors affecting student success before making adjustments to the existing policy and regulatory frameworks, which remains largely fit for purpose.
- Incorporate monitoring of quality Indigenous Higher Education standards and performance in the HESF to ensure quality education and a quality education environment to support student learning.
- Consider amending section 7.2 of the HESF to explicitly recognise the relationship between provider and student expectations through individual Student Charters.
- Review external support settings, particularly Centrelink arrangements, to address negative impacts on students attending, staying, and completing university and improving the student access and welfare systems.

Section 1 – Major concerns/feedback

Q1. Do the Threshold Standards sufficiently describe what quality providers should be doing to support student retention, completion and success, including students from under-represented groups, and with regard to avoiding unnecessary debt?

Universities are committed to supporting and implementing the HESF in all aspects of student engagement, irrespective of background. Whilst the discussion paper distinguishes between this review of the HESF and the Support for Student Policy amendments to HESA and the subsequent guidelines, significant overlap exists that may impact the current review responses. Drawing on both, therefore, is necessary to clarify what does and does not exist in supporting students in the regulatory space.

Universities acknowledge that the HESF sets minimum standards and constantly strive to be responsive to their communities, often exceeding these minimum standards across the seven key areas of the HESF. Updating the HESF to formally recognise 'new minimums' or a single, clear set of sector-wide standards would be an effective way of recognising the work providers already do, whilst signalling to Australians that universities are meeting their expectations in quality and supportive tertiary education. However, these standards must be

appropriately articulated within the HESF and should, as they currently do, be complimentary to each other and allow flexibility in responding to a university's constituents.

In addition, issues of student success also relate to affairs beyond the scope of the HESF, such as personal circumstances, structural issues (e.g., poor or inconsistent internet access, or lack of childcare) that are not within the remit of providers to rectify and these indirectly but disproportionately impact students from under-represented cohorts; i.e. there are issues that impact student success that cannot be resolved by altering the quality framework. Nonetheless, where jurisdictionally appropriate, universities will continue to support students to resolve or alleviate matters beyond their direct remit. This support goes beyond the minimum standards set out in the HESF and reflects each university's requirement in their founding Acts to be community-focussed.

Q 1a: How do the Threshold Standards guide institutions' provision of support for students?

The HESF is, intentionally, designed to provide a framework for individual providers to develop policies, procedures and governance structures that respond to community and stakeholder needs. The standards require individual providers to meet certain benchmarks as a sector and to respond, when need be, to new challenges with necessary autonomy in a non-prescriptive manner. Specifically, they follow three foundational principles:

- the principle of regulatory necessity
- the principle of reflecting risk, and
- the principle of proportionate regulation.

Accordingly, the implementation of the HESF is diverse; however, TEQSA provides a range of supportive documents that guide more specific aspects of the implemented policies and procedures TEQSA looks for during an assessment, investigation or registration renewal process. It would be unrealistic and restrictive for the Standards to list all measures for each cohort as the context of universities, and the challenges students face, are different. An example of the success of the current nature of the HESF occurred due to the rapid and unexpected shift to online learning during the COVID-19 pandemic lockdowns. Despite the pandemic, the HESF still applied, and providers were able to evolve and respond accordingly to support students. As the 2020 Quality Indicators for Learning and Teaching (QILT) student experience survey demonstrates, most students expressed overall satisfaction with their experience of online learning. Subsequently, universities are developing and deploying a range of policies to meet the varied requirements of the HESF whilst factoring in any specifics highlighted by TEQSA.

Q 1b: What drives institutions to make improvements to the support provided to students?

Universities, as with all higher education providers, have a mandate to teach and support learning. In addition to undertaking 33 per cent of Australia's R&D, 91 per cent of all discovery research, and 42 per cent of all applied R&D (2021-22), universities have a social obligation to teach the many generations of young and mature students as they leave school, develop their careers, learn for interest and critically engage with the world. This mandate extends to community engagement – locally, regionally, nationally and internationally – by providing cutting-edge research and teaching and learning activities, which all support Australia's growth, culture and prosperity.

In this context, universities have a foundational mission to undertake continuous generational improvement to support students to succeed and get the most out of their university experience. This underpinning is also reflected in the Governing Acts of each State and Territory university. All State and Territory Acts highlight the importance of supporting equity, diversity and inclusion, a commitment to supporting student safety and wellbeing, the establishment of codes of conduct, and recognition of academic rigour through academic standards and assessments to support student learning and outcomes.

In addition to the informal feedback obtained by universities, there are other means of getting information to help improve support mechanisms for students, particularly via surveys such as QILT, the Graduate Outcomes Survey (GOS), the Student Experience Survey (SES) etc. Triangulation of all the information is important in helping students in need of support.

In summary, universities have a long history of responding to student needs and adapting their teaching and learning and research offerings to be socially relevant. For instance, research via the National Centre for

Student Equity in Higher Education, the Melbourne Centre for the Study of Higher Education, annual international STARS reporting tool for university sustainability and HERDSA demonstrate the extensive track record of universities seeking to address student issues in meaningful ways.

Whilst beyond the scope of this review, government support for good practice sharing would support this institutional objective whilst enabling the government to actively view and engage with these activities. The previous Office of Learning and Teaching was a strong facilitator of such sharing and supported provider activities in a range of areas, including supporting students.

Q 1c: Are the requirements of the Threshold Standards sufficient for addressing the support needs of all students, including those from under-represented groups?

The HESF, being necessarily broad in scope and design, meets the needs of students, including those from underrepresented backgrounds, insofar as they enable universities to respond in a timely manner to meet emergent issues and individual needs. Further, ensuring all students are treated equally under the HESF is an important and necessary mechanism reflective of the realities of supporting all students attending university. All supports for students and student wellbeing are designed with the assumption and purpose in mind of supporting all students when they need support. This position recognises that all students should be treated equally in having access to support services and considerations and should not be categorised. Categorising students in this regard could have negative consequences and be perceived to be targeted or discriminatory.

However, funding for support for students is based on the whole person and not a portion of study load or EFTSL. This means that funding to support students from under-represented backgrounds and those who study part-time, in particular, is stretched further than it is for other students. In other words, challenges with satisfactorily supporting students are not always related to an issue with HESF, but reflect an issue with the resources available to support students.

Recognising this funding and support environment, and, in particular, the impact this context has for Indigenous students, amendments to the HESF could reflect the monitoring of quality Indigenous Higher Education standards and performance, as well as protect and assure the quality of Indigenous education from a student, environment, teaching and learning and research perspective. The current provision places more of a focus on specific Indigenous student programs/Centres instead of considering broader influences of a university environment and governance.

UA and the broader higher education sector is unaware of any evidence that has been posited to suggest the HESF is not fit for purpose.

Q2. Are higher education providers appropriately implementing the Threshold Standards?

TEQSA takes a risk-based approach to regulating the sector and to undertaking assessments and imposing conditions on individual providers. This reflects both the necessity for flexibility at the sector level – allowing providers to respond to their unique circumstances whilst setting standard and reasonable expectations – and the importance of addressing issues or concerns at an institutional level. This practice has been successful with universities meeting the HESF for re-accreditation.

Since TEQSA was established, few providers have had significant conditions imposed and, where a condition has been imposed, the individual provider has addressed the issue. This history demonstrates universities are appropriately implementing the HESF to the fullest extent, whilst making efforts to continuously improve and respond to changing social, technological and cultural needs of staff and students, and local and regional communities.

Q 2a: What mechanisms are used to embed the Threshold Standards into institutional practice, particularly in relation to student support?

The key mechanism by which compliance with the HESF is assured is through cyclical renewal-of-registration processes. Current processes used by TEQSA for assuring compliance involve scrutinising the extent to which requirements of the HESF are embedded in institutional governance frameworks, business schedules,

agendas and agenda papers, and minutes. Given that all Australian universities have successfully navigated at least one renewal-of-registration cycle, they have each satisfied TEQSA that they are appropriately implementing the HESF, including those standards relating to student support.

In addition to student feedback, self-reviews, assurance and oversight by governance committees relating to compliance with standards, and external reviews (e.g. academic and corporate governance required by the HESF, program reviews), universities have dedicated teams across a range of operational areas within the university that are responsible for implementing the HESF. These teams, which may often be coordinated by a central office within the governance component of a university, are responsible for monitoring the HESF and the guidance notes provided by TEQSA in relation to academic and student matters and to review and amend all policies and procedures on a schedule to ensure compliance.

Furthermore, the HESF is also embedded into organisational objectives and strategies, flowing into operational plans and processes, assurance management and business continuity plans, continuous improvement and quality enhancement cycles, and day-to-day activities including delivery of support services. Reviewing the implementation of these standards and adjusting policies accordingly to meet community needs is part of annual university review cycles. The timeframe for reviewing varies between institutions; however, a maximum limit on the time between reviewing courses, policies and procedures is seven years (HESF 5.3).

The HESF requires that universities regularly review and amend all policies and procedures. This results in a continuous improvement process which ensures that at the time of TEQSA re-registration, the university will already be largely compliant with the HESF. Additionally, universities must report to TEQSA when they find a situation where they are non-compliant and explain to TEQSA what they will do to return to compliance.

Q 2b: Have institutional efforts to improve student retention, completion and success highlighted any challenges for implementing the Threshold Standards? If so, what?

Universities must, at all times, comply with the HESF. Universities have in place a range of support services dedicated to supporting students to succeed at university, through whatever definition is appropriate to the student and as decided by the student and support service. However, ongoing tension on the definition of 'success' from changing government policies can impact a provider's ability to appropriately respond to different student needs.

UA recommends the government consider better alignment between policies influencing student engagement (e.g. student income support, welfare system, labour market dynamics). By viewing concerns of student success as a deficiency in the drafting or policy requirements set out in the HESF misidentifies the external issues that require other interventions, such as improved welfare support for students to attend and stay at university.

Q 2c: Should the Higher Education Standards Framework include expectations for sharing good practice?

No. Sharing of good practice should not be a regulatory requirement or a requirement for accreditation/re-accreditation. It is a practice not a measure of a provider's activities.

However it should be noted that sharing of good practice is already undertaken in many ways, including through TEQSA's Higher Education Integrity Unit, which works closely with the sector to address academic integrity issues such as contract cheating. It is also undertaken through various fora related to specific higher education practices and community engagement and support initiatives.

Seeking to combine sharing of good practices within the HESF does not align with the intent of the HESF. The combination could easily lead to biasing of assessment, compromised integrity of assessment practices and be open to political influence, which are all antithetical to the purpose of the HESF and the principles that underpin it and the integrity of the sector. Acknowledging section 6 of the HESF provides for the implementation of good practice in student support and teaching, this remains a non-regulatory purpose aligned to a provider's mission of supporting students.

Q3. Do students know what protections and support are available to them, and are they adequate from a student point of view?

Universities strive to meet the needs of their communities, yet there are potentially opportunities to improve how and when these responses are made and who is involved in meeting the needs of these groups.

Universities are required to publish their policies and procedures so that all students and staff have access to and can understand the university's responsibilities and their own. Universities provide extensive information on their institutional webpages, particularly at student commencement and orientation periods. Furthermore, dedicated teams across the university provide ongoing messaging to students about various support services, opportunities and other important information.

While universities may provide this information to students through a range of communication avenues, students, at the start of their university life and for each subsequent year, acknowledge their own responsibility to be informed of this information and to seek it out for their own benefit. This position reflects the importance of student autonomy in decision making and is an important part of university learning.

However, in order to more clearly recognise the relationship between provider and student 7.2 of the HESF could be amended to include a provision to the effect of 'the provider makes it clear what students can expect and its expectations of what students should do to optimise their educational outcomes' through a student charter or similar.

Q 3a: Do the Threshold Standards provide an adequate level of support and protection for all students? What, if any, changes to the Threshold Standards would improve support provided to students in higher-risk categories?

The HESF are broadly fit-for-purpose and provide a minimum level of support and protection for students, taking into account student autonomy and self-determination as students and a provider's responsibility to evolve and adapt to changing socio-cultural needs. Whilst setting a minimum standard, universities respond to the HESF according to their communities, which often set higher standards in different areas.

Universities govern their activities according to individual Acts and Councils, and in some cases have Student Charters which set out what students can expect the provider to do and what the provider expects (wants) students to do. The approach individual institutions take to implement the HESF is discretionary to the needs of their local communities and student and staff cohorts. However, all providers are required to give advice and communicate the availability of services to students throughout a student's university life. This information flow starts before a student applies to a university and extends to when they become an alumnus but differs by individual provider. At all stages, however, universities recognise the autonomy of individual students and their responsibility to be self-informed and to acknowledge they have read and understood their obligations to the university and the governing Acts, as well as to complete tasks assigned to them by the university to assist them in their learning and experience and student wellbeing.

Regarding student autonomy and self-determination, this often-overlooked aspect of post-school, typically 18+ aged cohort is an inextricably important part of understanding the limitations of university services and provision of information. Nonetheless, all universities have policies and measures in place to identify students at risk of non-completion or who are struggling with university and provide proactive advice and additional supports.

Ultimately, universities must adhere to the HESF, whilst meeting their own social contract of community engagement and responsiveness; however, it is similarly the responsibility of students to engage effectively, understand the policies and procedures communicated to them and to seek help when needed. If a policy or procedure creates unreasonable barriers for students, this should be made clear to the provider directly or in consultation with TEQSA where internal University processes are not available/responsive.

Q 3b: In addition to providing support, what do institutions do to assure themselves that their students are aware of the available supports and can access them when needed?

Universities have proactive mechanisms for identifying students at risk of not progressing and intervene with guidance, referrals to support services and academic advice at certain touchpoints throughout the academic and non-academic year. These services are reviewed annually in accordance with internal review processes to meet the changing needs of students and staff. These reviews are not stagnant, and universities continue to strive to improve student awareness of supports and services. This is particularly important at key periods throughout the year, such as census date or after an incident in the community or university. In addition, student support professionals generally work in close collaboration with academic colleagues to promote services at key milestones in the academic calendar. Additional measures include:

- Regular reporting to Academic Board and Senior Management Groups on retention and completion rates.
- Having student representation on governance and management committees to ensure strong feedback on institutional approaches to student support and their awareness of that support.
- Regular monitoring of websites and information provided to students.
- Monitoring of data from college/faculty and central student offices, counselling services, academic support services, libraries and other support services to understand what information students are seeking and their awareness of services
- Strong relationships with the Student Unions who provide regular feedback about any concerns that students may have in relation to awareness of supports available.
- Often a Dean of Students office provides advice to students in need of help or support and this office provides an annual report that may indicate any concerns about student awareness of services and supports.
- Orientation activities during the beginning of every semester include a process for review and feedback from students.
- Complaint mechanisms at the University level may reveal where students are not aware of support services.
- The data from student feedback surveys for every unit is monitored by the colleges/faculties and central administrators.

Q 3c: Have you identified recent trends or specific areas of concern in student experiences of support that have implications for the Threshold Standards?

Increase in part-time students affecting support service provision: Increase in part-time students or fractional enrolments has been notable, with the average student load among domestic students steadily decreasing over recent years, dropping from approximately 0.70 EFTSL in 2016 to about 0.65 EFTSL in 2022, with further declines observed anecdotally in 2023. While this trend may not directly impact the HESF, it does impose an additional financial strain on universities in upholding HESF standards, particularly regarding student support services.

Student support services, including Counselling and Student Advising, are typically accessible on a headcount basis, while funding is allocated on a per-EFTSL basis. Furthermore, this financial burden is not evenly distributed across universities. Regional universities, for instance, face an average student load of 0.55 EFTSL, while some metropolitan universities see an average load of around 0.75 EFTSL. Consequently, regional universities often find supporting approximately a third more students with the same funding allocation as other institutions.

Increase in off-campus learning: The rise in online enrolment increased considerably during COVID, while on-campus learning has markedly decreased over the same timeframe, with the "internal" mode of attendance diminishing from 72% of enrolments in 2016 to 52% in 2022. This shift carries significant ramifications for universities' capacity to implement to the HESF to the same degree as on-campus supports. This change also increases the associated expenses required to maintain the same standards for both on-campus and remote students. Facilitating meaningful engagement opportunities for students poses a particularly formidable challenge in this context.

While TEQSA guidance acknowledges variations in service provision to students based on their mode of attendance, there is limited recognition of the complexities associated with delivering support services remotely. Specifically, there is little acknowledgment of the hurdles in proactively identifying and addressing

mental health issues and ensuring a safe virtual environment. These challenges underscore the need for a nuanced understanding and proactive measures to support students in online learning environments.

Each of these areas are the result of external factors beyond the scope of universities. These changes, particularly regarding fractional enrolments relate to policy and social issues, often associated with funding issues to support student access to university. Universities carry the consequences of these issues and work to resolve them whenever and wherever possible to support students to access and succeed at university. However, there is a limit to which universities can operate without appropriate government and other stakeholder support.

UA recommends a review of support settings external to the HESF and providers that are directly affecting and, in some cases, negatively impacting students to attend, stay and complete university. A good first step is reviewing the Centrelink arrangements to keep pace with economic changes and to support students at university.

Q4. What can be done to improve the Threshold Standards, their implementation and higher education providers' compliance with these Standards?

Whilst the Thresholds Standards are broadly fit for purpose and provide, necessarily, flexibility in implementing them, there may be instances where they can be open to interpretation which could lead to a miscommunication of expectations between providers, assessors and government.

Q 4a: Are there any areas in relation to language, clarity, structure, format or currency where you believe the Threshold Standards could be improved?

The HESF is an example of stable, effective policy, with limited need to tweak. Consistent with findings of the Administrative Appeals Tribunal against TEQSA (2023), there is a pressing need to better codify expectations of performance against the HESF. TEQSA guidance notes provide limited additional information on expectations of how the HESF can be translated into institutional contexts or how student support should be optimised. Many of the requirements in the Guidelines for the Support for Students policy (2024) could readily be included in relevant TEQSA guidance notes.

Q 4b: Are there areas of inconsistency, overlap or duplication in existing regulatory and compliance requirements for the provision of support to students?

There is a need for a holistic review of sector regulation to reduce overlap between key governing pieces of legislation (HESF, HESA, ESOS and their supporting legislative frameworks). Each requires providers to have, and in some elements report on, support for students in broadly the same way, whether it is academic or pastoral support, effective induction/orientation, or progression intervention (for example Section 1.3 of HESF, Standard 6 of the National Code and Chapter 10 of the Higher Education Provider Guidelines). This creates an additional burden on providers to ensure that they are meeting the requirements of three separate yet related pieces of legislation that are all aiming to achieve the same thing, ensuring providers have support arrangements available and applied to students when and if needed.

As stated in the introductory remarks to this submission, clarity on the roles and responsibilities of sector regulators and the Department of Education is urgently needed to ensure providers invest their resources to the collective objective of these provisions, support for students, rather than having to ensure compliance with the nuances of each individual piece of legislation in this space, which detract and obfuscate the purpose of supporting students.

Q 4c: Do you have any other points you would like to raise about the Threshold Standards or their implementation in relation to student support?

Student support remains a key priority for all Australian universities; however, the regulatory and policy uncertainty is causing confusion, overlap, and disruption within the sector. There must be alignment between existing robust standards and policy changes should be consistent to avoid adverse outcomes for students and providers.

Implementation Considerations

Current and future student-related policies and regulatory impacts resulting from policy changes must be considered within a full governance and regulatory review. Duplicating regulatory requirements and splitting authorities on related issues may have unintended consequences to providers in their efforts to support students due to increased administrative requirements. Furthermore, this increased regulatory burden misses some root issues affecting student access to university and their ability to complete a degree: student access and welfare payments do not meet the contextual financial burdens impacting many students.

A key outcome of this current review into the fit-for-purpose nature of the HESF could be a broader review of the regulatory environment to showcase the existing complexities, the overlap in policies and the duplication of authorities that may cause adverse unintended consequences for students and staff. This would be both beneficial to providers in navigating the complex web of regulations and beneficial to government in articulating this complexity and regulatory overlap when considering changes to regulatory conditions and governance.

Conclusion

The Higher Education Standards Framework has had a positive, stable policy influence on the sector across the last decade. The 2011 iteration of the Standards was a reasonable interim measure to coincide with the establishment of TEQSA, but sector-wide consultation resulted in an updated framework that has stood the test of time. Only minor changes to Part A of the HESF have been made since introduced in 2014. Areas for improvement identified in the Universities Accord process are not, in the opinion of UA, symptomatic of structural flaws in the HESF.

The HESF provides minimum requirements across a range of compliance areas that providers must satisfy to be classified as an approved higher education provider. By design, and supported by decades of reviews when the HESF existed under previous forms of TEQSA, these minimum standards ensure providers satisfy a regulatory requirement, whilst enabling them to respond to their respective communities.

To ensure providers can reasonably and appropriately respond to their communities – students, staff, regions and partners – a minimum standard must remain that is nationally focussed and retains the flexibility for providers to evolve.

There may be scope to refine some language and terminology to better accentuate some issues, but there are risks in any attempt to redesign a HESF that is neither broken nor in need of major reform. Beneficial changes may include to make standards of student participation and attainment, learning environment, and teaching central to registration processes rather than indirectly considered in institutional academic and corporate governance processes. Similar logic can be applied to assuring compliance with other legislative instruments such as the Education Services for Overseas Students Act and Disability Discrimination Act, rather than introducing or amending policies to achieve outcomes already codified in policy.

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