

SUBMISSIONS TO THE HIGHER EDUCATION STANDARDS PANEL

MARCH 2026



TABLE OF CONTENTS

OVERVIEW	4
DEMONSTRATING A COMMITMENT TO ADDRESSING RACISM	6
Q1. What specific actions should higher education providers be required to take to demonstrate a clear, institution-wide commitment to addressing racism?.....	7
Q2. What targeted guidance would most effectively support providers to meet strengthened anti-racism expectations?	8
Q3. What are the principal benefits and potential limitations of explicit anti-racism standards compared with reliance on existing wellbeing, equity and governance provisions?.....	9
INCORPORATING THE UNIVERSITY GOVERNANCE PRINCIPLES AND TRANSPARENCY REQUIREMENTS	10
Q4. 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’?.....	11
Q5. How might strengthened standards on academic oversight, staffing profiles, and teaching quality affect student outcomes and experience?.....	12
SUPPORTING PEOPLE WITH DISABILITY IN HIGHER EDUCATION	13
Q6. 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?	14
Q7. To what extent would the proposed themes promote accountability, better governance and improved provider practice to support people with disability in higher education?	14
EMERGING TECHNOLOGIES AND THE HIGHER EDUCATION REGULATORY FRAMEWORK.....	15
Q8. 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.....	16
Q9. Do the standards currently provide adequate guidance to manage risks related to emerging technologies?	17
Q10. How should amended standards appropriately balance the management of risks with the need to preserve provider flexibility, so as to support ongoing innovation?	18
APPROACH TO A CYCLICAL REVIEW OF THE THRESHOLD STANDARDS.....	19
Q11. What methodological approaches should underpin a cyclical review of the Threshold Standards to ensure it is robust, proportionate and evidence-informed?	20
Q12. How can a review process be designed to meaningfully engage a diverse range of stakeholders?.....	20
REFERENCES	21



ABOUT THE REGIONAL UNIVERSITIES NETWORK

The Regional Universities Network (RUN) welcomes the opportunity to provide a response to the Higher Education Standards Panel: Consultation on amendments to the Higher Education Standards Framework (Threshold Standards) 2021.

RUN is a national collaborative group of six regional Australian universities: Charles Sturt University, CQUniversity Australia, Federation University Australia, Southern Cross University, University of New England, and University of Southern Queensland.

This submission reflects the positions of RUN institutions, and in doing so, also aims to represent the views of the communities which RUN universities serve; the one-third of Australians who live outside of metropolitan centres in regional, rural and remote locations.

For further information please contact RUN on 0408 482 736 or info@run.edu.au.

OVERVIEW

RUN supports the ongoing review and enhancement of the Threshold Standards, to ensure the minimum requirements expected of Australian universities remain contemporary and fit-for-purpose. As part of this review and amendment process, RUN agrees that the five key areas subject to proposed amendment:

- Demonstrating a commitment to addressing racism;
- Incorporating the University Governance Principles and transparency requirements;
- Supporting people with disability in higher education;
- Responding to emerging technologies including Generative Artificial Intelligence (GenAI); and
- a cyclical review of the Threshold Standards

are important matters that all university stakeholders must, and do, take seriously. RUN is therefore eager to be part of the national discussion on how universities can best meet their responsibilities regarding the key areas for amendment proposed by this consultation.

RUN believes this consultation process would benefit from clearer detail as to how the five key areas are intended to appear within the Threshold Standards, and how they may be regulated against in practice. Given the complexity of issues being discussed, the operational implications for universities adhering to them, and the unintended consequences that may arise as a result, RUN would be eager to provide considered feedback to the specific wording of amendments being proposed. Furthermore, the truncated timeframes for the sector to consider and respond to this consultation process are largely incompatible with meaningful dialogue, which RUN believes undermines the process of developing effective policy. As such, RUN would support an additional round of sector consultation once the specific (draft) amendments to the Threshold Standards can be articulated, while allowing stakeholders sufficient time to provide more considered feedback.



OVERVIEW

Australian universities operate in a highly regulated environment, which is an important and necessary feature of a robust and sustainable tertiary sector. Nonetheless, there has been an increasing and accelerating trend of overtly prescriptive and interventionist regulation to Australia's higher education sector in recent years. Not only has the majority of new regulatory requirements been unfunded, but it is also often unhelpfully duplicated across agencies and jurisdictions creating an unnecessarily complex and burdensome regulatory environment. The compounding higher education regulatory landscape disproportionately encumbers Australia's smaller/regional universities – those universities who typically perform the sector's heavy lifting in tertiary participation amongst equity cohorts.

Irrespective of the consultation process, RUN holds the fundamental belief that the design of regulatory obligations for universities within Australia's higher education system should avoid needless duplication. That is, if the five key areas outlined within the consultation paper are to be included explicitly within the Threshold Standards, then the corresponding regulatory and reporting obligations upon universities should not be repeated elsewhere within the regulatory ecosystem. Similarly, if there is a case that any/all of the five key areas are already adequately addressed elsewhere within the existing regulatory ecosystem, then they ought not be replicated unnecessarily within the Threshold Standards.

RUN firmly believes that the Threshold Standards should continue to adhere to the three basic principles of regulation as outlined in the Tertiary Education Quality and Standards Agency Act 2011:

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

I RUN SUPPORTS:

RUN supports a detailed consideration of whether the five key areas are already the subject of existing regulation with the view to identifying opportunities to remove duplicative regulation.

It is RUN's concern that the proposed amendments to the Threshold Standards may contribute further to the growing expanse of regulatory burden upon Australian universities, which disproportionately impacts smaller and regional universities and the underrepresented student cohorts they support.



KEY AREA 1

A diverse group of young people, including men and women of various ethnicities, are smiling and laughing together outdoors. They are dressed in casual, contemporary clothing like hoodies, jackets, and plaid shirts. The background shows a cloudy sky and a body of water, suggesting a beach or waterfront setting. The overall mood is positive and inclusive.

**DEMONSTRATING
A COMMITMENT TO
ADDRESSING RACISM**

DEMONSTRATING A COMMITMENT TO ADDRESSING RACISM

Q1. What specific actions should higher education providers be required to take to demonstrate a clear, institution-wide commitment to addressing racism?

The obligation upon universities to ensure a supportive and inclusive learning environment for all students regardless of race, culture or background – an environment where student wellbeing and safety is central – is embedded within the existing Threshold Standards (Section Two: Learning Environment, including 2.2 Diversity and Equity, 2.3 Wellbeing and Safety, 2.4 Student Grievances and Complaints, and 6.1 Corporate Governance). Universities must proactively address racism as set out in multiple federal and state frameworks/legislation to which universities abide. These include the Racial Discrimination Act 1975, the National Anti-Racism Framework, and various state-based anti-discrimination acts. These regulations necessitate proactive measures to prevent racial discrimination and harassment, ensuring a safe learning and working environment.

RUN acknowledges the Australian Human Rights Commission's recent report *Respect at Uni: Study into antisemitism, Islamophobia, racism and the experience of First Nations people*, which found that racism remains a significant barrier to equity and inclusion in Australian universities, affecting both staff and students, and undermining the sector's commitment to academic excellence and social responsibility¹. RUN also notes that the current Threshold Standards do not explicitly require a demonstrated commitment to addressing racism. As such, universities are discussing specific actions that they would consider to better demonstrate clear, institution-wide commitments to addressing racism (if not already undertaken), for instance:

- Inclusions of clear expectations within respective Staff/Student Codes of Conduct regarding a zero-tolerance of any form of racism.
- Clear disclosure/reporting mechanism accessible by staff and students to report concerns of racism where mechanisms should not be confusing or difficult to access.
- Mandatory anti-racism training for all university staff.
- Ensuring transparent reporting is introduced or strengthened on racism-related incidents, including responses and institutional responses/actions.
- Wherever possible, providers to have consistent, whole-of-institution policies governing all types of racist behaviours (e.g. antisemitism, anti-Islamic discrimination, and/or racism against First Nations peoples) with the same language, expectations and penalties.
- Seeking opportunities for co-designing relevant policies and programs with First Nations communities.

In designing potential amendments to the Threshold Standards that may strengthen institutional commitments to addressing racism, it is important to recognise that Australia's higher education system is diverse and autonomous. This diversity and autonomy is a strength, and it should be used to allow institutions to work within their distinct communities, stakeholder bases and social missions to develop tailored approaches to addressing racism. RUN recognises that what may be effective in addressing racism (or the potential for racism) within the context of one university community may not be entirely fit-for-purpose within another university community. Indeed, the Australian Human Rights Commission's recent report *Respect at Uni: Study into antisemitism, Islamophobia, racism and the experience of First Nations people* rightfully acknowledges that racism affects various communities differently². RUN would therefore urge against an overtly prescriptive 'one-size-fits-all' approach to demonstrating a clear, institution-wide commitment to addressing racism.

DEMONSTRATING A COMMITMENT TO ADDRESSING RACISM

Q2. What targeted guidance would most effectively support providers to meet strengthened anti-racism expectations?

RUN reinforces the value in preserving university diversity and autonomy and avoiding overtly prescriptive 'one-size-fits-all' approaches to demonstrating clear, institution-wide commitments to addressing racism. Nonetheless, there is value in providers having access to general guidance and resources that may assist them to proactively demonstrate and address racism more effectively. This may include:

- A centralised portal where institutions can go with queries and for advice, rather than being directed to multiple different bodies. Clear regulatory guidance will assist in consistent interpretation across the sector.
- Guidance on sector-wide culturally safe curriculum design and inclusive teaching practices to assist academic staff to embed these principles within learning and teaching.
- Templates for transparent reporting to encourage consistency and reduce administrative burden.
- The provision of practical case studies demonstrating how institutions of differing sizes and social missions (including regional universities) might implement anti-racism strategies proportionately.
- Clear guidance on the evidentiary expectations regulators may apply when assessing institutional responses to racism-related incidents.

DEMONSTRATING A COMMITMENT TO ADDRESSING RACISM

Q3. What are the principal benefits and potential limitations of explicit anti-racism standards compared with reliance on existing wellbeing, equity and governance provisions?

While the existing wellbeing, equity and governance provisions within the Threshold Standards ought to adequately provide the minimum expectations of safe and inclusive learning environments free from racism, the outcomes of the Australian Human Rights Commission's report *Respect at Uni: Study into antisemitism, Islamophobia, racism and the experience of First Nations* makes it clear that more explicit and proactive steps are required to combat racism at Australian universities.

The benefits of more explicit anti-racism standards becoming incorporated into the Threshold Standards include the setting of clear, unequivocal expectations upon all universities insofar as addressing racism (or the potential for racism to occur). This would help to strengthen student, staff, and community confidence that instances of racism will be addressed appropriately.

The limitations, however, may depend on the specific wording of eventual amendments to the Threshold Standards. There is a risk of existing wellbeing, equity, and governance standards provisions within the Threshold Standards being duplicated, which may compound reporting requirements. It would be important for any additional regulatory requirements upon providers to be balanced, streamlined, and proportionate. Any potential amendments or additions to the Threshold Standards must also take a principled, high-level approach to the expectations upon providers. An overtly prescriptive approach with granular expectations upon providers would not only increase the regulation and compliance load of universities, but would deny universities the opportunity to co-develop culturally-specific approaches to combating racism within the diverse communities that are served by different providers.

RUN returns to its central point that, should the regulatory obligations of universities in demonstrating more explicit and proactive steps to combat racism be positioned within the Threshold Standards, then they ought not be needlessly duplicated elsewhere within the regulatory ecosystem.



KEY AREA 2

**INCORPORATING
THE UNIVERSITY
GOVERNANCE PRINCIPLES
AND TRANSPARENCY
REQUIREMENTS**

INCORPORATING THE UNIVERSITY GOVERNANCE PRINCIPLES AND TRANSPARENCY REQUIREMENTS

Q4. 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'?

RUN remains supportive of the eight University Governance Principles as developed by the Expert Council on University Governance, and acknowledges their role in promoting greater integrity, accountability and transparency within the higher education sector. RUN supports the eight Principles being reflected within the Threshold Standards.

However, RUN disagrees with the justification within the consultation paper that private (Table B) university providers could reasonably be excluded from proposed Part C provisions because they are already subject to board or shareholder oversight, alongside their compliance to ASX Corporate Governance Principles. The matters being addressed by the eight University Governance Principles are important for a world class university system, and these principles should apply to any provider (public or private) who accepts public funding to participate in Australia's university system. Furthermore, the eight University Governance Principles are not in seamless alignment to the Eight ASX Corporate Governance Principles. For instance, unlike the University Governance Principles, the ASX Corporate Governance Principles do not explicitly promote the need for independence of academic standards and freedoms, which is a fundamental component of the university system. It is important that all providers within Australia's university system be held to the same standards and expectations. RUN believes it is also disingenuous to claim that public (Table A) providers are not equally held to account by board or 'shareholder' oversight. Public universities have robust and democratic-driven council oversight of their strategies and operations, and their 'shareholders' (the students, industries, and communities served by each university) consistently play a key role in shaping the direction of their university, and in holding their university to account.

RUN holds concerns that an omission of private universities from proposed Part C provisions within the Threshold Standards may create unintended outcomes. This may include the creation of a second tier within Australia's higher education system whereby some providers can avoid governance accountability mechanisms designed specifically for university contexts, while simultaneously avoiding the cost of resourcing corresponding compliance requirements. It may also send a signal that integrity issues are more likely to arise at public institutions despite ample examples of poor governance within privately listed companies, including those in the education industry, thereby undermining social confidence in the integrity of Australia's public universities. RUN supports the Threshold Standards being amended to incorporate the University Governance Principles, but does not support the omission of private universities from the corresponding regulatory oversight against the University Governance Principles.

INCORPORATING THE UNIVERSITY GOVERNANCE PRINCIPLES AND TRANSPARENCY REQUIREMENTS

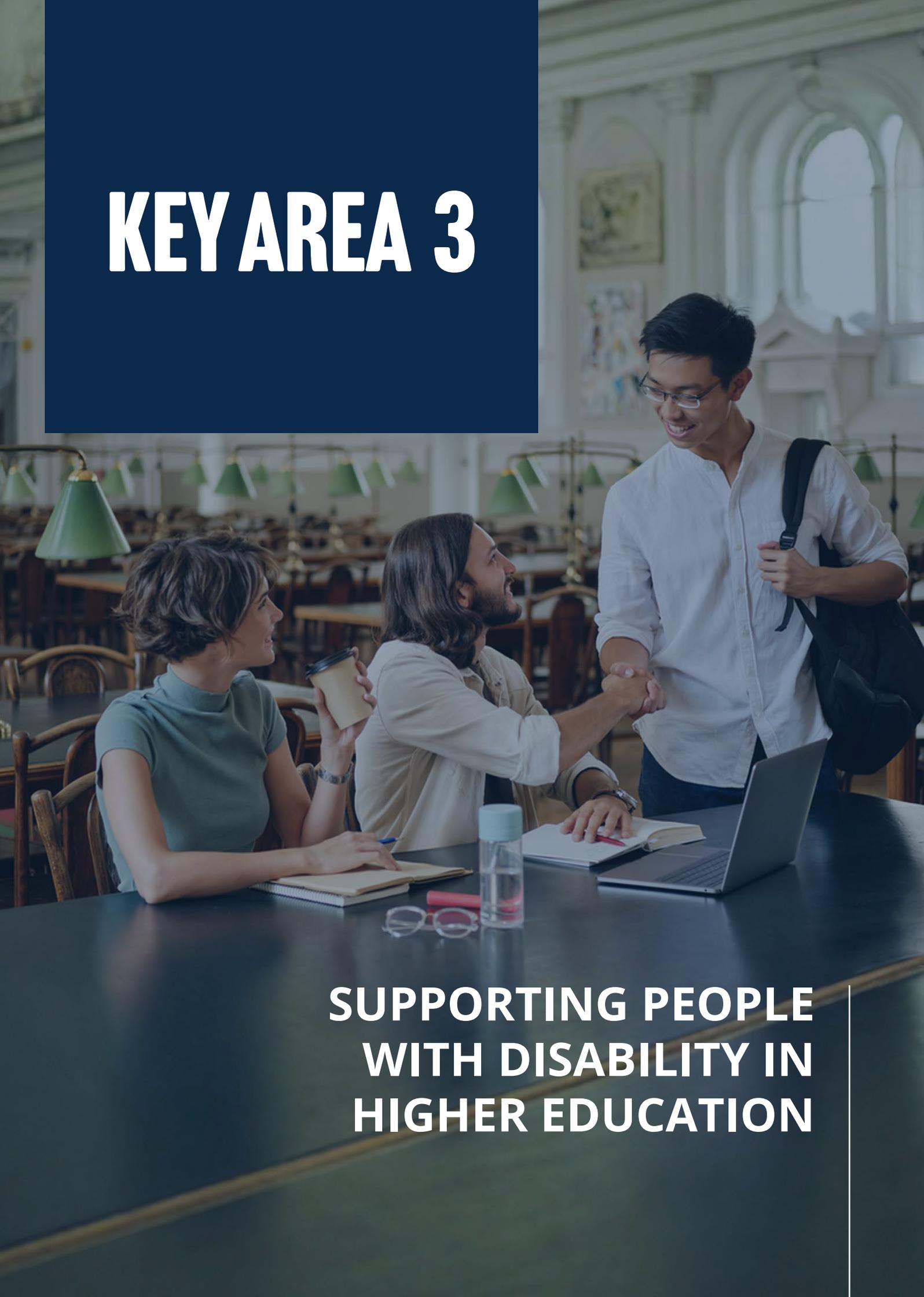
Q5. How might strengthened standards on academic oversight, staffing profiles, and teaching quality affect student outcomes and experience?

RUN supports the existing Threshold Standards as they apply to matters of academic oversight, staffing profiles and teaching quality. RUN does not believe a compelling case has been made for these matters to be amended from how they are currently presented within the Threshold Standards. Over many years, the students and graduates of Australian universities (as well as their employers) have consistently ranked their university experiences and outcomes highly. This suggests that the current Threshold Standards have been consistently successful in facilitating overwhelmingly positive outcomes and experiences for Australian students, and that universities take matters of academic oversight, staffing profiles, and teaching quality seriously. RUN holds concerns that amendments to the Threshold Standards as they concern academic oversight, staffing profiles, and teaching quality would not only be unnecessary, but the corresponding increase in regulatory burden upon smaller and regional providers will inevitably be resourced at the expense of frontline learning experiences and student supports. It is Australia's smaller and regional universities who host the largest concentration of students from underrepresented backgrounds. This may lead to an unintended consequence whereby the compliance requirements of the proposed amendments have a negative impact upon the outcomes and experiences of Australia's underrepresented student cohorts.

Should amendments to the Threshold Standards be made in relation to academic oversight, staffing profiles, and teaching quality, RUN would advocate that academic freedom and institutional autonomy be preserved in the design of amended standards. It is important that any amended Threshold Standards remain outcomes-focussed and flexible in how providers meet staffing and quality expectations, particularly for institutions delivering education across geographically dispersed regions, and through online and blended delivery models to diverse student cohorts. Any amendments should also consider that many factors influencing student outcomes sit well beyond the control of a university, such as cost-of-living pressures, employment demands, family or caregiver responsibilities etc...



KEY AREA 3



**SUPPORTING PEOPLE
WITH DISABILITY IN
HIGHER EDUCATION**

SUPPORTING PEOPLE WITH DISABILITY IN HIGHER EDUCATION

Q6. 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?

RUN supports the focus given to the proposed themes of inclusion, universal design and inherent requirements within the consultation paper. Furthermore, RUN acknowledges the case for the Threshold Standards to be updated as to remain contemporary and fit-for-purpose in an evolving higher education landscape. Enhancing aspects of tertiary inclusion, universal design, and inherent requirements within Australia's higher education sector will inevitably benefit all staff and students, including those with disability especially if they lead to a more consistent experience for students with disability, regardless of institution.

However, the implementation of additional standards and expectations will come at a direct cost to universities, particularly smaller regional universities whose capacity to absorb regulatory impost without sacrificing frontline student experiences and supports is limited by their social missions within unscaled regional markets. The cost burden in meeting ever expanding compliance requirements falls disproportionately upon smaller and regional universities, who host the highest concentrations of underrepresented student cohorts. This disproportionate impact must be factored into future funding and reporting models, as to avoid unintended outcomes of best-intention policy.

Q7. To what extent would the proposed themes promote accountability, better governance and improved provider practice to support people with disability in higher education?

RUN remains supportive of practical and achievable measures that lead to greater support of people with disability in higher education. RUN believes that any amendments to the Threshold Standards that seek to promote greater accountability, better governance, and improved provider practice to support people with disability should focus on institutional commitments and outcomes. However, it is vital that provider flexibility in how inclusive learning environments can be co-designed and delivered in partnership with those within each university community who live with disability is preserved. A more prescriptive approach that increases regulatory compliance activity will inevitably impact upon smaller and regional universities most acutely. As such, nuanced consideration must be undertaken in the design of Threshold Standards amendments as to avoid unintended consequences impacting upon the very universities who support the largest concentrations of students from underrepresented backgrounds, including students with disability.

KEY AREA 4

A photograph of four diverse young adults (two men and two women) standing in a row, smiling and looking towards the camera. They are positioned in front of a wall made of vertical wooden slats. The man on the far left has a beard and is wearing a black leather jacket over a white shirt. The woman next to him is wearing a black beret and a dark jacket over a yellow top. The man next to her has glasses and is wearing a light grey sweater. The woman on the far right has red hair and is wearing a white top with a dark polka-dot collar and a matching skirt. The overall mood is positive and professional.

**EMERGING TECHNOLOGIES
AND THE HIGHER
EDUCATION REGULATORY
FRAMEWORK**

EMERGING TECHNOLOGIES AND THE HIGHER EDUCATION REGULATORY FRAMEWORK

Q8. 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.

The term 'emerging technologies' is widely accepted as a general catch-all phrase that broadly captures new, innovative technologies. An 'emerging technology' is one that is in its early development or adoptions stages, yet is poised to create social, economic, or industrial disruptions. RUN would argue that AI, for instance, is no longer an emerging technology, but one that is today deeply embedded within tertiary activities and student practice. The disruptive legacy of AI technology is now firmly underway, rather than being on the horizon. As such, the proposed 'emerging technology' terminology, while workable and generally understood by most, may not enable a longevity of technical accuracy, with more and more technologies rapidly moving beyond the 'emerging' phase. RUN questions whether 'emerging and rapidly evolving technologies' may enable a more accurate and enduring terminology to be used in this context. RUN is perhaps less concerned about the specific terminology being employed, and more focussed upon how 'emerging technologies' (or alternative terminology) may be positioned within the amended Threshold Standards, and what compliance obligations fall upon providers as a result. RUN would advocate for a principled (rather than prescriptive) approach to how the Threshold Standard positions the role/risk of these technologies, and the subsequent expectations upon universities.



EMERGING TECHNOLOGIES AND THE HIGHER EDUCATION REGULATORY FRAMEWORK

Q9. Do the standards currently provide adequate guidance to manage risks related to emerging technologies?

RUN believes the existing Threshold Standards are adequately set the expectations upon universities to manage risks related to emerging technologies appropriately. RUN acknowledges that the existing Threshold Standards do not explicitly reference 'emerging technologies' or other technology-specific risks, but nor do they explicitly focus upon other specific potential risks, such as terrorism, natural disaster, global financial events, or higher education policy volatility. Instead, the existing Threshold Standards rightfully address the expectations upon universities in managing a broad base of risk, however it may manifest. RUN acknowledges the recent actions taken by TEQSA in response to the rise of GenAI tools (sector webinars, sector consultations, and the development of toolkits and the GenAI Knowledge Hub) as being highly effective in raising awareness and providing expert guidance on GenAI tools. TEQSA's expert guidance in this space demonstrated best practice, which did not require any change to Threshold Standards.

As such, RUN is not convinced that amendments that explicitly address 'emerging technologies' are necessary. Universities are acutely aware of the heightened risk that accompanies 'emerging technologies'. It is in no university's interest to allow 'emerging technologies' to undermine academic quality and integrity. The enduring sustainability of universities relies upon the production of consistent outcomes for students and the workforces they graduate into. Universities have been, and will continue to be, the pioneers of innovations and new technologies within teaching, learning, and research contexts. RUN is concerned that Threshold Standard amendments that veer towards prescriptive undertakings may likely suppress the pioneering nature of universities who innovate their practices with technology. RUN is also concerned that an explicit focus upon one specific risk factor within the Threshold Standards may diminish the importance of monitoring other unspecified risks. Rather, RUN believes the Threshold Standards should remain principles-based and technology-neutral. The role of regulators like TEQSA should be to identify best practice, and to promote minimum standards of practice via regularly updated guidance.

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EMERGING TECHNOLOGIES AND THE HIGHER EDUCATION REGULATORY FRAMEWORK

Q10. How should amended standards appropriately balance the management of risks with the need to preserve provider flexibility, so as to support ongoing innovation?

Any amended standards should outline the minimum expectations of universities, while remaining principle-based and non-prescriptive in guidance. Innovation is best supported when regulatory expectations are clear about what must be demonstrated but neutral about how it is achieved. It is vital that universities themselves be responsible for determining how they are best positioned to meet those expectations and manage the associated risks. What is effective for one university in meeting a standard (with its own distinct scale, student cohorts, resources, expertise, networks and social mission) may not be effective for another university. For instance, a provider may manage academic risk via different degrees of supervised performance, iterative design with embedded defence, authentic professional simulation, or other models suited to their social mission and student cohorts.

It is also important to ensure that any new or amended standard is designed with proportionality in mind, such that smaller or regional universities are not disadvantaged by their scale.



KEY AREA 5

A photograph of three young women laughing and walking together outdoors. The woman on the left is wearing a yellow and black plaid shirt over a white top and blue jeans. The woman in the middle is wearing a green t-shirt and tan cargo pants. The woman on the right is wearing a blue sleeveless top and blue jeans. They are all smiling and appear to be in a good mood. The background shows a building and some greenery.

APPROACH TO A
CYCLICAL REVIEW
OF THE THRESHOLD
STANDARDS

APPROACH TO A CYCLICAL REVIEW OF THE THRESHOLD STANDARDS

Q11. What methodological approaches should underpin a cyclical review of the Threshold Standards to ensure it is robust, proportionate and evidence-informed?

RUN supports a cyclical approach to reviewing, and wherever necessary updating, the Threshold Standards as to ensure their enduring relevance to an evolving sector. However, any process of cyclical review should seek to be grounded in regulatory intelligence, sector data and risk trends, while including a structured evaluation of unintended consequences.

Review timing should also align with other regulatory/reporting cycles (such as Compacts). Review processes must also demonstrate best practice in consultation and engagement with a broad range of sector stakeholders (including students), to enable diverse feedback. Consultation processes should not be rushed, instead enabling appropriate time for stakeholders to provide considered feedback. A cyclical review process that still allowed for interim guidance to be developed as urgent risks emerge would be beneficial. Importantly, future amendments must preserve the principle-based approach to the Threshold Standards, balancing flexibility, innovation, and proportionality for a diverse and autonomous sector. Prescriptive approaches to amendments must be avoided.

Q12. How can a review process be designed to meaningfully engage a diverse range of stakeholders?

RUN believes consultation upon cyclical (or unscheduled) review processes must reflect the diversity of the sector that the Threshold Standards seek to serve. This would require genuine attempts to elevate the voices of historically underrepresented stakeholders or student cohorts in the consultation process. In particular, the voices of regional, rural and remote students, stakeholders and peak bodies should be prioritised.

Consultation processes ought to provide generous timeframes for participation. This should be easily accommodated within any pre-scheduled, cyclical consultation process. Allowing ample time for feedback is particularly important for smaller or regional stakeholders, who often lack the depth of resources readily available to larger stakeholders that enable them to routinely react to consultation quickly and comprehensively. More generous consultation timeframes will enable historically underrepresented voices to be elevated within broader discussion, as will a broader range of consultation mechanisms (such as forums, targeted meetings/roundtables etc...).

Consultation processes should also be conducted in stages and not just single point-in-time consultations. This will enable feedback to be gained at an early conceptual level, and subsequently at a detailed near-final level. Each stage of consultation should demonstrate transparent iterative feedback loops showing how earlier input has influenced outcomes.

REFERENCES

- 1 Australian Human Rights Commission (2026). Respect at Uni: Study into antisemitism, Islamophobia, racism and the experience of First Nations people. Accessed via <https://humanrights.gov.au/resource-hub/by-resource-type/reports/race/respect-at-uni-study-into-antisemitism,-islamophobia,-racism-and-the-experience-of-first-nations-people> on 10 March 2026.
- 2 Australian Human Rights Commission (2026). Respect at Uni: Study into antisemitism, Islamophobia, racism and the experience of First Nations people. Accessed via <https://humanrights.gov.au/resource-hub/by-resource-type/reports/race/respect-at-uni-study-into-antisemitism,-islamophobia,-racism-and-the-experience-of-first-nations-people> on 10 March 2026



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