

SUBMISSION TO TEQSA ON UPDATES TO THE REGULATORY RISK FRAMEWORK

APRIL 2026





INTRODUCTION

The Regional Universities Network (RUN) welcomes the opportunity to contribute to the Tertiary Education Quality and Standards Agency's (TEQSA) consultation on updates to the Regulatory Risk Framework (RRF).

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. RUN believes that all Australians, regardless of background or geography, should have access to an equitable standard of university opportunities, tertiary facilities and research services.

OVERVIEW

RUN broadly supports the intent of the revised RRF and believes it has potential to be a helpful self-assessment tool by offering greater transparency, consistency, and a collective understanding of key sector regulatory risks.

The updated RRF consolidates existing regulatory expectations into a clearer and more accessible format, while avoiding the introduction of new requirements upon providers. Its longer-term effectiveness, however, will ultimately be determined by how well it is implemented, applied, and how it is positioned within TEQSA's existing regulatory ecosystem.

RUN believes the sector would benefit from further information regarding how TEQSA intends to implement and utilise the RRF, particularly in relation to provider re/registration.

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QUESTIONS

Q1: What aspects of the RRF would most support provider and sector confidence in regulatory decisions informed by the framework?

RUN believes the RRF may lead to better transparency and consistency in TEQSA's assessments of provider risk, which will inevitably enhance regulatory decision-making. Provider confidence in regulatory decision-making will therefore be strengthened by the consistent and proportionate application of the RRF across the sector.

This includes, for instance:

- The clear articulation of regulatory intent, showing how TEQSA moves from evidence to judgement and connects Threshold Standards and ESOS requirements to defined regulatory risks and outcomes.
- The continued, reinforced understanding that the RRF does not carry additional regulatory requirements, or assign risk scores, or triggers automatic consequence. Rather the RRF exists to serve as a self-assessment and judgement-informing tool.
- The clear identification of key regulatory risks, thereby enabling providers to align their focus to areas of greatest concern.
- The outcome-based maturity descriptors recognising quality, effectiveness, and self-assurance beyond minimum compliance, supporting differentiated regulatory engagement.
- The explicit recognition of provider context, including scale, regionality, and student cohort diversity, which is important for a diverse and vibrant higher education sector.
- The clarity in linkages between legislation, outcomes, risks and maturity indicators, which may lead to enhanced clarity and defensibility of regulatory decisions, while an emphasis on proportionality and provider context supports appropriate and consistent application of the RRF across the sector.

Again, the effectiveness of the revised RRF – and the sector's confidence in it – will ultimately be determined by if/how the RRF is applied consistently over time and across assessments, and how it operates within TEQSA's existing regulatory ecosystem.



QUESTIONS

Q2: What aspects of the RRF are most useful in understanding TEQSA's risk focus and expectations?

The revised RRF provides a clear and useful articulation of TEQSA's regulatory priorities through the eight defined risk focus areas, while mapping key Threshold Standards and ESOS National Code requirements into explicit outcomes and key risks. Specifically, this structure will be helpful in:

- Improving alignment between regulatory intent and a provider's management of risk.
- Supporting consistent and context-based judgements of risk.
- Clarifying what effective and embedded assurance looks like in practice (particularly in relation to governance, student attainment, and academic integrity) via the self-assurance risk matrices.
- Promoting the role of effective governance oversight as a whole-of-institution responsibility, while prompting clearer dialogue between governing bodies, academic leadership and professional staff.

While the identification of the eight risk focus areas is useful, amendments could be made to some risk focus areas to include research and research training (for example, the quality of research and research training, as well as the quality of education, are equally impacted by (for instance) poor financial management or insufficient funding).

Similarly, there may be value in further examination and consultation as to how the RRF may take account of elements relating to transnational education. RUN would also seek further clarity on how TEQSA may treat risks that may manifest beyond providers' control.

Overall, RUN believes the revised RRF has the potential to clarify regulatory expectations for providers in an accessible framework through its integrated use of outcomes, risks, legislative mapping, and maturity descriptors.



QUESTIONS

Q3: What would help ensure that the RRF supports constructive regulatory engagement without becoming a checklist or compliance exercise for providers?

RUN would like to see the RRF used as flexible, outcome-focussed self-assessment tool rather than a compliance checklist that compels new reporting requirements. It is vital that risks and maturity indicators are illustrative, rather than prescriptive.

The framework must not become a template, rather it must accommodate providers' differing exposure to various kinds of risks, (e.g. on-campus vs online education, financial viability, workforce capabilities). The framework should be used to support contextual assessments, rather than acting as the basis for a rating system.

To help ensure the RRF does not become a checklist in practice, RUN would suggest that:

- TEQSA signals through its guidance and practice that quality narratives, evidence of decision making, and assurance processes are preferred over volume of documentation.
- Regulatory engagement continues to focus on outcomes and effectiveness, rather than prescriptive inputs or standardised artefacts.
- Differences in how embedded assurance is demonstrated across providers are recognised, noting that smaller and regional institutions often operate with integrated academic and professional functions.
- Provider understanding could be supported through context-based examples, emphasising governance effectiveness and continuous improvement over documentation.
- Implementation be reinforced with ongoing guidance, communication and sector engagement.
- Wherever appropriate, TEQSA considers the inclusion of terms and definitions, and guidance on performance measures and metrics. For instance, this approach could apply to the Risk Focus Area: Financial Viability and Sustainability, as well as the Risk Focus Area: Research (in terms of sharing benchmarking data and best practice).

Beyond all else, constructive regulatory engagement would be better supported when provider maturity in aligning to the RRF is demonstrated through governance-led assurance, rather than additional reporting layers.



QUESTIONS

Q4: Considering the RRF as one of TEQSA's regulatory tools, what impacts do you anticipate its implementation will have for your operations?

The implementation of the RRF has the potential to generate an overall net positive impact upon the operations of regional tertiary provider operations. If implemented correctly, the RRF could result in a better alignment of institutional risk management and quality assurance with TEQSA expectations, strengthening self-assurance through a clearer consolidation of governance and risk management evidence. Its impact will lead to a stronger emphasis upon defined risk ownership and assurance at the executive, academic, and governing body levels.

Some effort will be required of providers to map and align existing processes against the RRF, shifting workload towards strategic assurance and narrative development rather than transactional compliance activity. Over time, the RRF has the potential to support closer integration of strategy, risk, and performance across an institution.

While it is positive that the RRF does not introduce new regulatory requirements, the emphasis on demonstrating maturity across multiple risk focus areas may have implications for the time and resources required to evidence self-assurance in practice.

For smaller and/or regional universities who do not operate in scaled environments, this underscores the importance of proportionate expectations regarding the scope and depth of evidence required.



QUESTIONS

Q5: Do you have any concerns regarding TEQSA's implementation of the RRF? If so, what could TEQSA do to mitigate those concerns?

RUN has concerns about how the RRF may be implemented, rather than the design of the framework itself. RUN would be concerned if the RRF was to be treated as a checklist and applied inconsistently or disproportionately across different provider contexts.

In terms of proportionality, RUN holds concerns for the resource load that may fall upon smaller or regional universities, where the demonstration of comparable maturity signals may require disproportionate resourcing.

RUN would also be concerned if the maturity descriptors become minimum expectations, rather than being illustrative by nature. There is also a concern that, when there might be a difference between a provider's self-assessment/self-assurance of risks and TEQSA's assessment of those risks, this may lead to immediate action against a provider in the first instance, as opposed to constructive dialogue.

To mitigate these concerns, TEQSA should look to:

- Provide clear guidance and worked examples explaining how maturity judgements are formed.
- Provide ongoing training for its teams to ensure iterative calibration and consistency.
- Maintain ongoing sector engagement/feedback mechanisms to reinforce the intent of the RRF and refine its application, including its proportional application across differing provider contexts.
- Where appropriate, consider the inclusion of terms and definitions, and guidance on performance measures and metrics within the RRF.



QUESTIONS

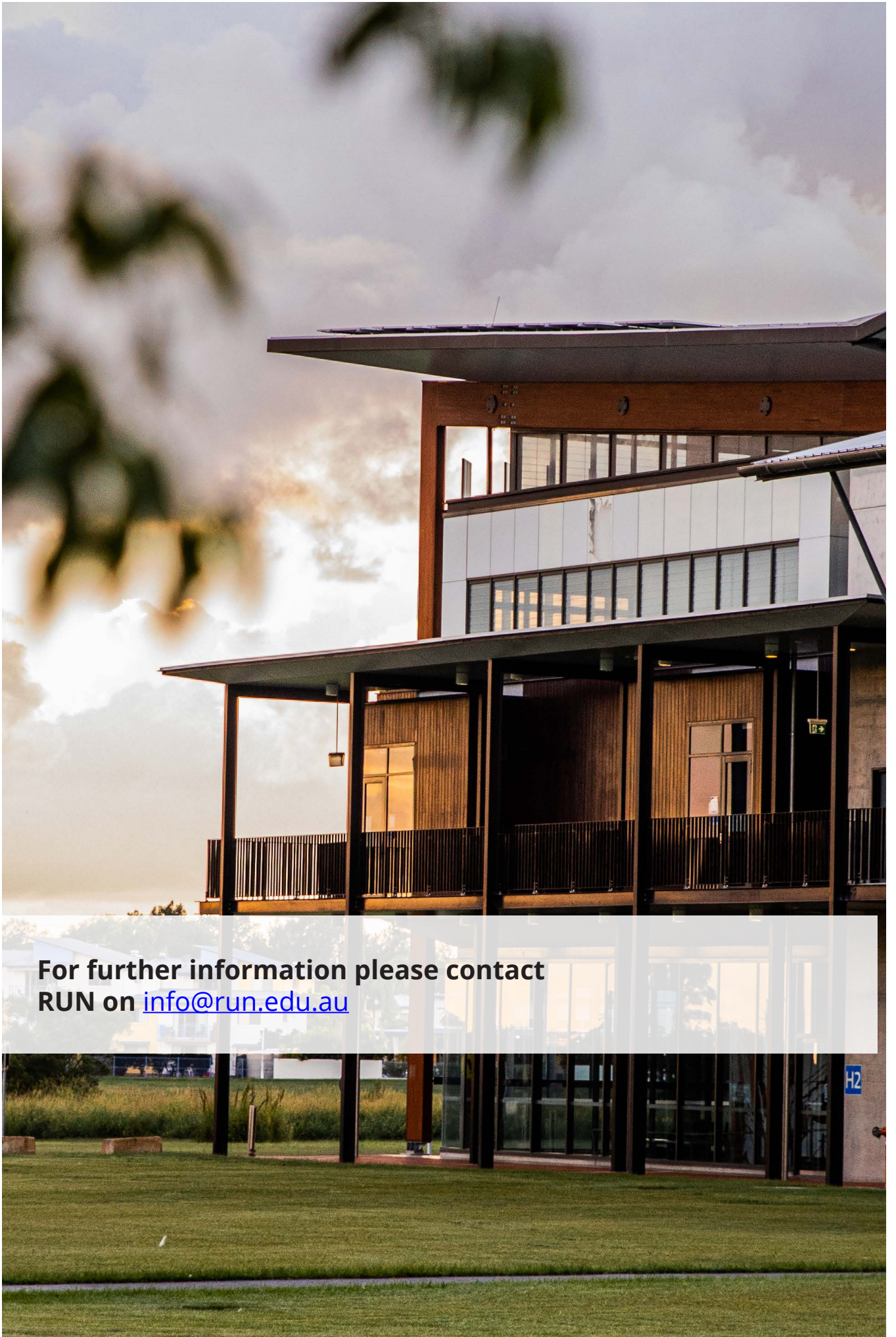
Q6: What would give providers confidence that the RRF appropriately recognises and uses outcomes of provider self-assurance as one input to inform TEQSA's regulatory assessments and decisions, noting that TEQSA uses a range of sources to determine regulatory assessments and decisions?

The sector's confidence in the RRF can be supported by TEQSA's ongoing recognition of provider self-assurance as a core input, alongside regulatory history, data and intelligence. TEQSA must continue to signal that self-assurance maturity can be demonstrated in different ways across different provider contexts, with effectiveness reflected through strong governance and accountability, active risk monitoring, evidence-based decision making and continuous improvement.

Provider confidence in how the RRF appropriately recognises and uses outcomes of self-assurance as a core input to inform regulatory assessments and decisions may be enhanced by TEQSA's attention towards:

- Transparently demonstrating how evidence of self-assurance and governance-led assurance influences regulatory posture, including reduced intensity of intervention where maturity is shown.
- Explicitly acknowledging governance-led assurance, including the roles of Academic Boards, Education Committees, and corporate governance frameworks.
- Recognising the role of student administration functions in safeguarding academic integrity, student progression, admissions standards, and compliance with ESOS and HESA obligations.
- The need to avoid privileging format or presentation, over substance, when demonstrating provider assurance activities and decision making.
- The provision of clear examples of, and feedback on, how self-assurance evidence/outcomes have been weighed in regulatory decisions.





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