ATN Universities Submission – Consultation on amendments to the Higher Education Standards Framework (Threshold Standards) 2021

12 March 2026

Key messages:
1. The Threshold Standards should remain principles-based to allow providers flexibility to implement the intent of the standards in ways appropriate to their institutional context.
2. Strengthened standards on inclusion should clarify how providers remain accountable for inclusive practice in work-integrated learning (WIL) and partnership-based delivery contexts where implementation involves external partners.
3. Amendments relating to emerging technologies should elevate governance and academic oversight expectations while remaining consistent with a principles-based regulatory approach.

ATN Universities welcomes the opportunity to respond to the consultation on amendments to the Higher Education Standards Framework (Threshold Standards) 2021. ATN Universities supports maintaining the principles-based nature of the Threshold Standards, which allows providers flexibility to implement requirements in ways appropriate to their institutional context while supporting the longevity and adaptability of the standards. As Australia's network of leading applied and industry-engaged universities, we focus our submission on two areas where regulatory settings directly affect applied delivery models and partnership-based education: supporting people with disability and responding to emerging technologies.

Supporting people with disability in higher education

Question 6: To what extent would inclusion, universal design and inherent requirements drive a more inclusive and equitable higher education system and improved student outcomes?

ATN Universities educates the largest share of university students with disability in Australian higher education (31%). As leaders in work-integrated learning (WIL), we have wide and deep experience with the challenges that students with disability can face in the workplace.

Inclusion and universal design improve equity and student outcomes when they are embedded systemically rather than treated as a compliance obligation. Many institutions currently operate under a reactive model, where adjustments are made in response to individual disclosure. While specialist disability units are well-versed in legislative requirements, knowledge and capability may not be consistently diffused across academic staff, placement coordinators and course designers. This leads to inconsistent student experience across institutions and programs. For ATN Universities, these issues are significant in WIL, fieldwork and professional accreditation contexts.

Embedding universal design principles within the Threshold Standards would shift institutional practice toward anticipatory design. Implementation will require significant sector-wide capability development and workforce upskilling, as well as redesign of curriculum and assessment practices. Any reforms should therefore recognise the scale of change involved and allow sufficient time for sector engagement and for institutions to implement inclusive design approaches effectively.

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Curriculum, assessment and digital environments designed for the widest range of learners reduce reliance on individualised adjustments and minimise points of friction. Clearer articulation of inherent requirements would also improve transparency for prospective and current students. Standards should preserve flexibility for institutions to align inherent requirements with professional accreditation, occupational health and safety obligations, and legitimate course learning outcomes. Maintaining a principles-based approach will allow institutions to implement these requirements in ways appropriate to their disciplines and delivery contexts.

Question 7: To what extent would the proposed themes promote accountability, better governance and improved provider practice?

The proposed themes will promote improved governance and provider practice if responsibility for inclusive practice is not confined to specialist units and sits across institutional leadership and academic processes. This is particularly important in WIL and partnership-based delivery models where delivery involves external partners; in these instances, the provider remains accountable for student support and inclusive practice. Amendments to the Threshold Standards should require providers to demonstrate how inclusive practice is monitored and reported through academic governance structures, embedded in course approval and review processes, and reflected in partnership agreements and delivery arrangements in WIL and third-party contexts.

Our experts find ambiguity around how providers ensure reasonable adjustments when learning occurs in workplace or partnership settings can result in inconsistent practice and elevated withdrawal risk for students. Clear regulatory expectations that providers remain accountable for inclusive practice in these contexts would strengthen consistency across the sector. Institutional governance arrangements should ensure that inclusion is monitored and reviewed as part of broader institutional performance and accountability processes.

Responding to emerging technologies

Question 8: Does the term 'emerging technologies' adequately capture the range of innovations transforming higher education?

The term is workable provided it remains broad and principles-based, as attempting to define specific technologies risks rapid obsolescence. The regulatory focus should encompass generative artificial intelligence and technologies embedded in, but not limited to, industry practice that shape curriculum design, assessment integrity, research methods and professional capability.

Question 9: Do the standards currently provide adequate guidance to manage risks related to emerging technologies?

The existing Threshold Standards provide implicit coverage through general governance, academic integrity and risk management provisions. However, the rapid integration of generative AI and other technologies has highlighted differences in institutional practice. Explicit reference within the Standards to governance oversight of technology-related risks, rather than prescriptive controls targeting specific tools, would improve clarity and consistency.

Standards should require providers to demonstrate how academic governance reviews assessment design, maintains academic integrity and assurance of learning, and supports staff and student capability development in the face of rapid technological change. Technology-related risks, including data security, privacy, operational resilience and reputational exposure, should be integrated into institutional risk frameworks.

Question 10: How should amended standards balance risk management with preserving provider flexibility and innovation?

Amendments should remain principles-based and focused on demonstrable oversight, capability and integrity. ATN member universities operate in fast-moving technological and workforce environments. Overly detailed or technology-specific drafting risks constraining curriculum responsiveness and authentic, industry-based

assessment models. Regulatory settings should therefore avoid mandating technological controls or assessment formats.

This can be achieved by requiring clear governance accountability, expecting institutions to demonstrate coherent risk management and academic oversight, while preserving flexibility in implementation. This approach strengthens public confidence while maintaining the adaptive capacity necessary for industry engagement and workforce-aligned education.

ATN Universities supports amendments that reinforce inclusion, integrity and effective governance while maintaining the principles-based approach that underpins the Threshold Standards. In both disability inclusion and emerging technologies, reforms should provide clearer regulatory expectations that strengthen accountability, while preserving the flexibility necessary for innovation and workforce responsiveness.

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About ATN Universities
ATN Universities is a national network of Australia's most industry-engaged universities: Curtin University, Deakin University, RMIT University, the University of Newcastle and the University of Technology Sydney. Swinburne University of Technology joined the network in 2026 as an observer. Together, we educate more than 320,000 students and operate Australia's largest transnational education network, with 13 overseas campuses in 10 countries. Our mission aligns directly with Australia's economic priorities: a modern workforce, stronger business and technological innovation, and diversified export markets.