

# **UA submission on TEQSA's Interim Statement of Regulatory Expectations: Student Grievance and Complaint Mechanisms**

27 March 2025



## Introduction

Universities Australia provides the following feedback on TEQSA's Interim Statement of Regulatory Expectations (the Statement) concerning student grievance and complaint mechanisms. UA members remain committed to supporting good-practice governance including adherence to the Higher Education Threshold Standards as self-accrediting organisations, and continuing self-assurance for the effectiveness and suitability of mechanisms and processes concerning grievances and complaints. Despite this, UA cannot support the proposed Statement as currently drafted. The Statement does not complement existing measures and is seemingly based on a misunderstanding of the reality of the grievance and complaint context in the sector.

### UA recommends that TEQSA

- not proceed with the Interim Statement of Regulatory Expectations and,
- consider alternate approaches more aligned with TEQSA's functions and powers and risk-based approaches, such as the provision of Guidance Principles.

### Disproportionate claims to the experiences of the sector

TEQSA's assertion of systemic issues relating to student grievances and complaints handling is disproportionate to the experiences of the sector. The statement that "the greatest risk to students resides within universities, given the number of students they enrol and the complexity of their operations" does not recognise the excellent work universities do to foster positive on and off-campus experiences for students.

Data captured by the Quality Indicators for Learning and Teaching (QILT) demonstrates that overall, students have a positive experience at university. This statement ignores the contextual complexities of operating significant organisations like universities and unfairly disaggregates universities from wider society.

### Complementing existing measures

Universities, as self-accrediting institutions, have demonstrated consistent responsiveness to student, staff, and sector-wide concerns. This has included proactively addressing matters relating to gender-based violence and wage underpayment among others. Notably, no current UA members have had conditions imposed upon them by TEQSA recently, underscoring their ability to adhere to the Threshold Standards and regularly undertake self-assurance. As noted in the consultation paper, there is ongoing work in this space and UA and its members have and will continue to work with the Government and communities to address these ongoing measures.

Furthermore, if there are well-founded concerns with providers meeting the Threshold Standards for student grievance and complaints handling this should be addressed through existing mechanisms, rather than through the introduction of a new mechanism. It is unclear how the Statement sits alongside TEQSA's functions and powers. To support the existing mechanisms for reporting on these matters, TEQSA could produce guidance principles to address matters raised by the Statement.

UA notes that regulatory interventions should complement, rather than prescribe institutional policies and sector-wide commitments. Universities have independently identified and addressed areas for improvement, embedding transparent, accessible, and accountable grievance-handling processes that align with both the Higher Education Standards Framework and student needs.



## **Conclusion**

UA recommends that TEQSA reaffirm its commitment to proportionate, risk-based regulation that recognises the sector's established record of responsible self-governance. Introducing another level of bureaucracy is ill-advised in the current environment of over-regulation and conflicting regulatory responsibilities that remain unresolved, as is the case with the Student Support Policy. While the proposed approach aligns with parts of the Threshold Standards, it is a dichotomous position compared to the principles underscoring them.

UA welcomes continued dialogue with TEQSA to ensure that the final statement of expectations aligns with principles of good regulatory governance, supports student wellbeing, and best supports the sector through recognition of universities' longstanding commitment to accountability and self-regulation.

UA highlights the importance of TEQSA's role as a sector partner, providing advisory support and monitoring compliance where genuine risks arise, rather than instituting prescriptive reporting requirements that may unduly burden institutions or duplicate upcoming regulatory changes. A collaborative approach will be key to ensuring that regulatory oversight remains targeted, proportionate, and effective.