Guidance note: Staffing

Version 1.0 (11 June 2025)



TEQSA

TEQSA's guidance notes are concise documents designed to provide high-level, principles-based guidance on interpretation and application of specific standards of the <u>Higher Education Standards Framework (Threshold Standards) 2021</u>. They also draw attention to other interrelated standards and highlight potential risks to compliance. They do not introduce prescriptive obligations.

The definitive instruments that set out providers' obligations in delivering higher education remain the Threshold Standards (as amended on advice from the <u>Higher Education Standards Panel</u> to the Minister for Education from time to time) and the <u>Tertiary Education Quality and Standards Agency Act 2011</u>.

In early 2024, TEQSA consulted stakeholders with a draft version of the guidance note about staffing and considered all feedback.

This guidance note was finalised on 11 June 2025.

The purpose and intent of the guidance note about staffing is to support providers in developing policies and processes to ensure there is requisite workforce planning and oversight of staffing arrangements and that both academic and professional staff have sufficient knowledge, skill, resources, qualifications or experience to provide adequate support to students and lead them towards expected learning outcomes.

For the full list of guidance notes and resources, please see the <u>TEQSA website</u>.

1. What does staffing encompass?

Under the <u>Higher Education Standards Framework (Threshold Standards)</u> (Threshold Standards), registered higher education providers (providers) have obligations around staffing¹ to ensure that:

- student and staff support and services are sufficiently resourced by appropriately trained and qualified professional staff
- academic staff have sufficient knowledge, teaching capacity and teaching expertise to meet the needs of students
- research, research training, and scholarship is supported through appropriate policy frameworks and resources.

Workforce planning supports a sound approach to planning, developing, maintaining and optimising staffing arrangements. Successful workforce planning ensures a staffing profile that will fulfil the provider's higher education mission and ensure that the provider meets, and continues to meet, the requirements of the Threshold Standards and operates as an efficient organisation, both academically and corporately.

The primary part of the Threshold Standards that sets out providers' obligations around staffing is Section 3.2. Providers are expected to ensure their students:

- are supported in their learning
- have teachers who are qualified and equipped to lead them in their chosen course of study and towards expected learning outcomes
- can access teaching staff when seeking individual assistance.

Professional staff make important contributions to the delivery of learning and teaching. Providers should ensure they have sufficient professional staff to support the administration of learning and teaching operations and that these staff have the contemporary knowledge and skill needed to meet the requirements of their roles.

Similarly, providers should confirm, through regular oversight, that academic staff, particularly those responsible for teaching and supervision, are appropriately equipped for their roles. This includes ensuring academic staff have, and continuously hold through ongoing professional development:

- knowledge of contemporary developments in their discipline or field, informed by continuing scholarship and/or research
- knowledge of current teaching and assessment approaches relevant to the discipline, and the skills and capacity to apply and disseminate disciplinary knowledge relevant for the mode of delivery and the needs of students
- knowledge of institutional policies on academic integrity and how to identify potential academic and research integrity breaches and take appropriate action
- a qualification in a relevant discipline at least one level higher than is awarded for the course of study, or equivalent relevant academic, professional or practice-based experience and expertise, except for staff supervising doctoral degrees having a doctoral degree or equivalent research experience.

Guidance note: Staffing 1

^{1.} For the purposes of the Threshold Standards, 'staff' includes personnel who are engaged in work for the provider even if they are not formally employed by the provider (e.g. honorary teachers, researchers or supervisors). Where such work is necessary or critical to the mission of the provider it needs to be encompassed by workforce planning. The term 'staff' includes both academic (teaching and research) and professional staff and encompasses the critical role of service delivery staff in the student experience.

Providers are also expected to ensure that staff in the academic leadership team hold the necessary skills and experience to:

- · determine academic policies and standards for the provider
- guide and supervise less experienced staff.

Further, when undertaking research training, a provider should have enough suitably qualified and experienced academic and professional staff to provide supervision and support to research candidates in the fields of research being undertaken. The research output of students undertaking research training must also be assessed by suitably qualified experts who:

- · are independent of the work being assessed
- have international standing in the relevant field of research to be assessed
- have the competency to undertake assessments.

2. What TEQSA will look for

TEQSA considers relevant standards from the Threshold Standards in the context of staffing and workforce planning, among which most notably are:

Part A: Standards for HE providers	Key considerations
2.1.1-3: Facilities and Infrastructure	 There is appropriate staffing to ensure facilities and infrastructure are fit for purpose, sufficient for the students who use them and accessible when needed.
2.3.4: Wellbeing and Safety	 Providers promote and foster an environment that safeguards and supports the wellbeing and safety of both staff and the students they support.
3.2.1–5: Staffing	 Staff have appropriate training, level of qualifications and knowledge of contemporary developments in a relevant field or discipline to meet expected student learning outcomes.
	 Teaching staff who do not meet the standard for teaching or supervision are supervised by staff who do.
	 Professional staff have sufficient knowledge, skill and capacity to meet the administrative needs of student cohorts.
	 There are sufficient resources, including staff, to deliver new or reaccredited courses.
	 Staff are accessible to students seeking individual assistance with their studies.
	 Academic staff maintain knowledge of contemporary developments in relevant disciplines or fields, and skills in contemporary teaching, learning and assessment principles.

3.3.4: Learning Resources and Educational Support	 Staff who deliver learning support offer services tailored to the mode of study and specific needs of student cohorts.
4.1.2: Research	 Research staff are equipped with the qualifications, experience and skills required for their roles.
4.2.2-3a-c: Research Training	 As part of their research training, research students are supported by continuing supervisory arrangements.
	 Research students are provided with the appropriate resources, study environment, and support required for their project.
	 Supervisory staff have the requisite qualifications, experience and currency of knowledge in a relevant field of research to support research students.
	 Supervisors demonstrate on-going, original research contributions to a relevant field or discipline.
5.3.3 and 5.3.6: Monitoring, Review and Improvement	 The quality of teaching within a course of study, including staff support, is continuously improved and maintained through cyclic monitoring and review.
	 Teachers and supervisors have access to feedback on their performance and are supported in enhancing these activities.
5.4.1–2: Delivery with other Parties	 The governing body assures that quality delivery is maintained where a provider enters an arrangement with another party, including assurance that obligations regarding staffing are being met.
6.1.4: Corporate Governance	 An institutional culture is promoted and maintained that ensures staff are treated equitably and appropriate consideration is given to the different supports required by diverse groups of staff.
	 A safe environment is promoted and maintained by taking a proactive and educative approach to wellbeing.
	 Staff wellbeing is fostered by addressing the need to minimise vicarious trauma and/or burnout of staff who work in student-facing roles.

Guidance note: Staffing

6.2.1a-c,e: Corporate Monitoring and Accountability

- Governing bodies ensure the provider has the capacity to deliver on its mission through its workforce with oversight of workforce needs and capabilities. Staffing is considered when setting and monitoring corporate directions and targets, considering resourcing needed to maintain and sustain the provider's business model, and identifying and managing risks.
- Governing bodies ensure the provider complies with legislative requirements such as workplace laws.
- Governing bodies ensure sufficient systems and processes are in place to address material risks such as underpaying staff.

6.3.1-2: Academic Governance

- Institutional processes and structures are in place to maintain academic leadership and academic oversight to mitigate risks and assure the quality of teaching, learning, research and research training, including risks arising from staffing.
- Staff in the academic leadership team hold the necessary skills and experience to perform their roles.

TEQSA will seek information demonstrating that the level and type of staffing for courses of study meet the requirements of the Threshold Standards. This includes information about the overall planned or current complement of professional and academic staff, and the capabilities of individual academic staff members. TEQSA will expect to see key elements of a workforce planning process encompassing planning, target setting, monitoring and improvement and that these elements give rise to informed views at senior executive and governing body level.

In the first instance, TEQSA will take account of the stage of development of the provider (e.g. new, developing or established) and whether the provider is in a relatively stable phase of staffing or is proposing new initiatives that require significant new workforce planning, such as:

- introducing a new field of education or course of study
- developing a new campus or mode of delivery
- a proposed change of provider category
- marked changes in service delivery or scale of operations.

Applicants applying for initial registration will need to provide TEQSA with a workforce plan detailing how they will achieve and maintain the quality and level of academic and professional staffing required. TEQSA will need to be satisfied that the provider will meet the staffing requirements of the Threshold Standards for the initial establishment phase and then continue to meet the requirements through subsequent phases. Providers will need to show how they will scale their workforce progressively as student numbers are projected to increase. The applicant should also prepare contingency plans to account for risks associated with key academic staff departing the provider.

To be satisfied that the relevant Threshold Standards related to staffing will be met and continue to be met, TEQSA will expect to see the following:

- Governance mechanisms that provide oversight of a provider's staffing arrangements
 - > The corporate governing body ensures there is a policy framework in place that provides leadership and governance of academic activities. The policy framework will need to cover selection and development of staff (including underperforming staff) and address the staffing requirements of the Threshold Standards.
- The actual, or projected, staffing complement for each course of study (including support functions and services)
 - > TEQSA will expect a provider's staffing of a current or planned course of study to be determined:
 - by the learning outcomes of the course
 - through analysis of the learning needs of students, including student access to academic staff outside of formal teaching hours
 - with consideration of contemporary knowledge required in the discipline or field, informed through continuing scholarship or research advancements.
- An appropriate level of academic leadership reflected in a provider's current staff profile or workforce plan
 - > The level of academic leadership should be consistent with the provider's:
 - scale, e.g. number of students, courses, teaching locations
 - fields of education and the Australian Qualifications Framework (AQF) levels of its courses of study.
- Adequate risk analysis and action plans to address issues relating to staffing
 - > The provider will need to demonstrate that the risks associated with projected developments (including those relating to the ability to meet staffing requirements) have been identified and that these can be managed and mitigated
 - > If a provider's staff profile or workforce plan shows a reliance on casual academic staff, the provider should demonstrate how it will ensure casual academic staff:
 - have and retain the contemporary skills and knowledge required to fulfil their roles
 - are allocated sufficient paid time to deliver effective teaching and support to students within the scope of their role.
 - > Where an issue related to staffing arises, TEQSA will expect a provider to demonstrate how it will remedy the issue and prevent it re-occurring. For example, if the provider shows a lack of action to effectively mitigate or resolve identified issues related to staffing, it should provide a credible action plan to show how it will identify and respond to these issues in future. This action plan should later be supported by documentation showing activities undertaken in accordance with the action plan and any subsequent monitoring or consideration of the issues by the provider's academic and corporate governing bodies.
- An outline of the actual or projected governance and quality assurance systems for academic activities (including boards and committees) and provision for staff to operate and support them. The outline will need to demonstrate that the requirements of the relevant Threshold Standards are met or will be met.

Obligations applying to providers of education to overseas students

Where it applies to a provider, TEQSA considers the <u>National Code of Practice for Providers of Education and Training to Overseas Students 2018</u> (National Code) and the <u>Education Services for Overseas Students Act 2000</u> (ESOS Act).

Sections of the National Code relevant to staffing are:

- **5.3.2** For students under 18 years of age, adults involved in or providing accommodation and welfare arrangements must have 'working with children' clearances.
- **6.5** A provider must designate a member (or members) of staff to be the official contact point for overseas students. These officers must have access to up-to-date details on the provider's support services.
- 6.7 The provider's staff who interact directly with overseas students must have knowledge
 of their obligations under the ESOS Framework.
- 11.2.6 The maximum number of overseas students reflects the appropriateness of the staff, resources and facilities for delivery of the course.

Relevant Australian legislation

It is important for providers to be aware of their obligations under other relevant legislation, including:

- Obligations related to student support are set out under section 19-43 of the <u>Higher</u>
 <u>Education Support Act 2003</u> (HESA) and apply to providers approved under the HESA.
- Each state and territory have their own legislated requirements related to working with children clearances for any staff working with students under the age of 18. Providers should refer to their own relevant state and territory agencies.
- Providers must fulfil their obligations under national workplace laws, such as the <u>Fair Work Act 2009</u> and the <u>Sex Discrimination Act 1984</u>. These include, but are not limited to, ensuring staff receive pay and conditions in accordance with relevant industrial instruments and complying with the duty to eliminate unlawful sexual discrimination in the workplace.

3. Identified issues

Within the context of the Threshold Standards, TEQSA has identified issues that may indicate risks to compliance regarding staffing. These include, but are not limited to:

Staff skills and knowledge

- Academic staff not having the appropriate qualifications to teach a course or providers
 not being transparent, consistent and appropriate in deciding whether a staff member's
 experience is equivalent to such qualifications.
- Research staff not having the requisite qualifications and currency of knowledge in the relevant field of research to provide effective supervision to research students.
- There is insufficient investment in the training, resourcing or tools of professional staff to enable them to effectively deliver support and administrative services to students.

- Academic staff teaching a course or subject they do not have the appropriate knowledge, skill and tools to teach.
- Insufficient oversight of academic staff who teach specialised components of a course and who do not fully meet the standard for knowledge, skills and qualification.
- Unclear or insufficient tools and guidelines for staff recruitment leading to risks of not recruiting staff with the required skills and knowledge.
- Academic staff responsible for teaching that are not engaged in active scholarship resulting in their knowledge becoming out of date. This may impact the quality of teaching and currency of content and assessment methods (see <u>Guidance note:</u> <u>Scholarship</u>).
- Insufficient delineation between professional development and scholarly engagement in institutional policies or processes, making it difficult to identify and manage risks arising from a lack of engagement in scholarly activities by academic staff.
- Insufficient recognition of staff development needs.

Staff resourcing and responsiveness to students

- Unrealistic projections of staffing requirements with unsustainable financial and/or educational outcomes.
- Staff numbers and capabilities not rising in line with rising student numbers as
 operations scale up, with attendant risks to educational delivery, student experiences and
 provider reputation.
- A provider has not taken steps to ensure it has sufficient academic staff to maintain a reasonable staff-student ratio within sector benchmarks.
- Academic staff responsible for teaching and supervising research are not available to support students in their studies at reasonable times. This includes casual staff who are not allocated time, or sufficient time, to provide this support.
- Insufficient professional staff to provide non-academic support within reasonable timeframes.
- Due to lack of capacity, academic staff are unable to mark student assessments or provide feedback in accordance with the provider's policies.

Academic oversight

- Academic leaders have insufficient academic skills and experience to guide and oversee teaching and learning quality.
- A senior academic is not assigned to oversee and coordinate a course of study, or where they are assigned, the senior academic delegates the responsibility to a junior staff member.
- No evidence that workplace and scholarship plans are consistently implemented.

Governance

- A lack of oversight of workplace and scholarship plans by the corporate and academic governing bodies.
- Poor organisational capacity to adapt to changing circumstances.
- Insufficient capacity to anticipate and respond to contingencies and uncertainties.

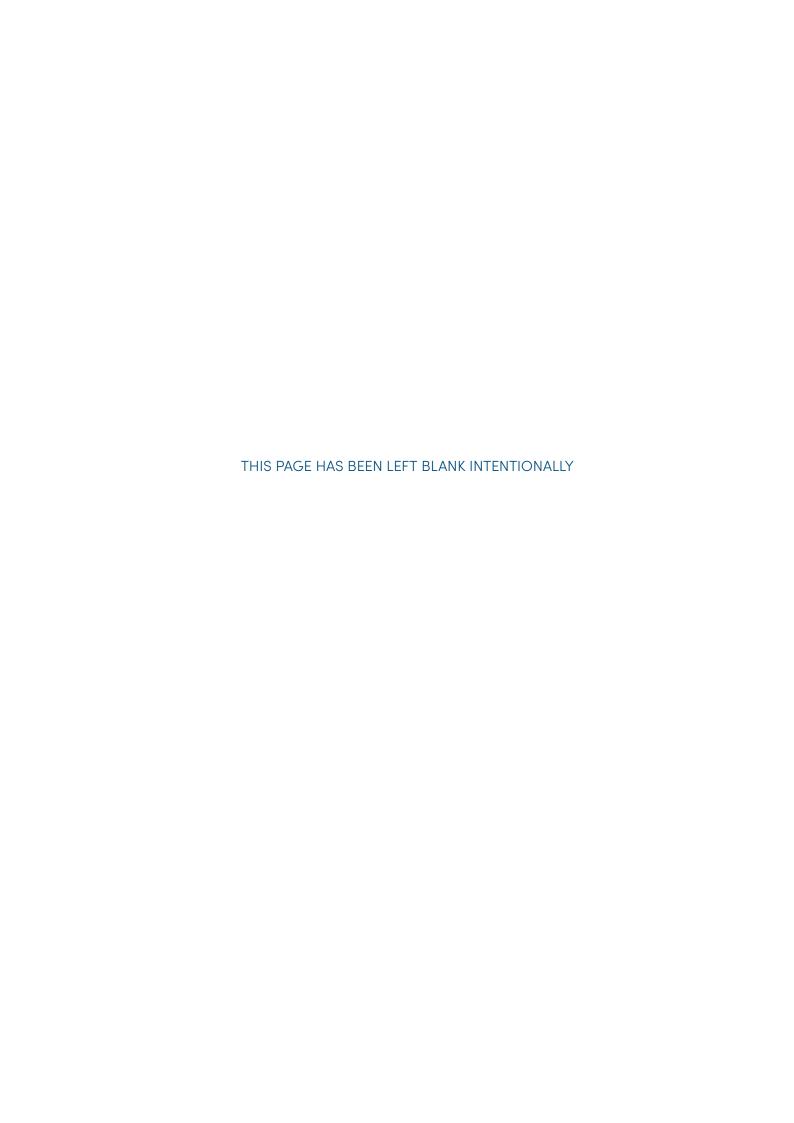
- Failure to consider the practical workforce implications of academic and/or corporate developments.
- A lack of monitoring or monitoring mechanisms to identify issues related to workplace obligations. These include the quality of teaching, staff-student ratio, whether payments to staff are in accordance with national workplace laws and whether existing payroll systems are capable of ensuring correct payments to staff.
- A lack of action to effectively mitigate risks or resolve identified issues related to workplace obligations, including wage underpayment.

Related resources

- Guidance note: Academic governance
- Guidance note: Academic monitoring, review, and improvement
- Guidance note: Course design (under development)
- Guidance note: Learning resources and educational support
- Guidance note: Diversity and equity (under review)
- Guidance note: Wellbeing and safety (under review)
- Guidance note: Scholarship
- Guidance note: Research and research training
- Statement of regulatory expectations: Compliance with workplace obligations
- Respect@Work website
- Fair Work Ombudsman: Tools and resources

Document information

Version #	Date	Key changes
1.0	11 June 2025	Major revision. This guidance note and Learning resources and education support replaces Staffing, learning resources and educational support.



TEQSA teqsa.gov.au