

# Material Change Notification Procedures

## Table of Contents

1. Governing Policy
2. Purpose
3. Scope
4. Definitions
5. Identifying a Material Change
  - 5.1. Indicators of a material change
  - 5.2. Reporting a potential material change
6. Notification to Regulatory Bodies
7. Authorities
8. Related Links

## 1. Governing Policy

[Risk Management Policy](#)

## 2. Purpose

- a. The University is obligated to disclose to the Tertiary Education and Quality Standards Agency (TEQSA) in a timely manner changes that will significantly impact its compliance with the Higher Education Standards Framework (Threshold Standards) 2021 (HES Framework). This is called a material change notification.
- b. These procedures outline the steps required to identify, report, and manage material changes in compliance with:
  - i. [Tertiary Education Quality and Standards Agency \(TEQSA\) Act 2011](#) (Section 29: Condition - notifying TEQSA of material changes)
  - ii. [TEQSA Material Change Notification Policy](#)
  - iii. [Education Services for Overseas Students \(ESOS\) Act 2000](#) (Part 3: Obligations on registered providers)
  - iv. [Critical Incident Management Procedures](#) (Section 8.3: Regulator communication of notifiable incidents).

## 3. Scope

These procedures apply to any activities or events across the University that may significantly impact the University's ability to comply with the HES Framework and require notification to TEQSA in accordance with the University's obligations and conditions under the TEQSA Act 2011, the ESOS Act 2000, and the TEQSA Material Change Notification Policy.

## 4. Definitions

### Material Change

A substantial change to a registered provider's circumstances, operations, or governance, or a significant event that may impact its ability to meet the conditions of registration or legislative obligations, in particular its compliance with the Higher Education Standards Framework (Threshold Standards) 2021 (HES Framework).

## 5. Identifying a Material Change

### 5.1. Indicators of a material change

- a. Activities or events will be assessed on a case-by-case basis and in reference to whether they substantially or significantly impact the University's ability to comply with the HES Framework and, therefore, meet the definition of a material change. Indicators can include:
  - i. changes in corporate governance, such as the appointment of a new Chancellor
  - ii. major incidents affecting student safety and well-being, including repeated cases of sexual assault or harassment, critical incidents, or significant breaches in safety protocols
  - iii. new or significantly changed arrangements, or issues that arise with, third party delivery providers (onshore and offshore)
  - iv. significant variations in enrolment numbers or financial forecasts impacting financial viability
  - v. events or activities impacting reputation and good standing, such as allegations of research misconduct under the *Australian Code for the Responsible Conduct of Research*, unscheduled compliance audits by external agents or government departments, or widespread adverse media attention.

### 5.2. Reporting a potential material change

- a. All staff are responsible for identifying potential material changes within their area of responsibility.
- b. If a staff member identifies a potential material change they must report it to the Senior Manager, Academic Quality, Compliance and Risk.
- c. Reports are to be made in writing and must include a description of the event or activity, anticipated or actual impact, and proposed management strategies.
- d. The Senior Manager, Academic Quality, Compliance and Risk will receive the report and:
  - i. escalate the matter to the Pro Vice-Chancellor (Academic Quality and Enhancement) for assessment and to determine whether notification to TEQSA is required
  - ii. prepare a notification in accordance with Procedure 6, below.

## 6. Notification to Regulatory Bodies

- a. The Senior Manager, Academic Quality, Compliance and Risk, in consultation with relevant areas (e.g., Governance, Legal and Risk), will prepare the notification to:
  - i. TEQSA, in line with Section 29 of the TEQSA Act and TEQSA's Material Change Notification Policy
  - ii. Department of Education, where required under ESOS legislation.
- b. The notification must include:
  - i. details of the material change
  - ii. assessment of its impact on compliance with conditions of registration
  - iii. mitigation or corrective actions being implemented.
- c. Notifications must be submitted within the timeframes specified by the relevant regulator:
  - i. **TEQSA:** typically within 14 calendar days of identifying the change
  - ii. **Department of Education:** as soon as practicable for ESOS-related changes.

- d. All material change notifications, supporting documents, and correspondence must be securely stored in the University's record management system.

## 7. Authorities

<b>Pro Vice-Chancellor (Academic Quality and Enhancement)</b>	<ul style="list-style-type: none"> <li>a. Assess the materiality and risk level of a major change and determine whether notification is required.</li> <li>b. Escalate to the Deputy Vice-Chancellor (Students) for final determination where necessary.</li> </ul>
<b>Deputy Vice-Chancellor (Students)</b>	<ul style="list-style-type: none"> <li>c. Make determinations as to what is considered significant or major in reference to whether an event or activity materially impacts the University's ability to comply with the HES Framework.</li> </ul>

## 8. Related Links

[Risk Management Framework](#)

[Critical Incident Management Procedures](#)

[TEQSA Material Change Notification Policy](#)

<b>Approval Authority</b>	Deputy Vice-Chancellor (Students)
<b>Responsible Officer</b>	Pro Vice-Chancellor (Academic Quality and Enhancement)
<b>Approval Date</b>	4 March 2025
<b>Effective Date</b>	4 March 2025
<b>Review Date*</b>	2028
<b>Last amended</b>	
<b>CM file number</b>	CF25/286

\* Unless otherwise indicated, this policy or procedures still apply beyond the review date.

Printed versions of this document are not controlled. Please refer to the [Flinders Policy Library](#) for the latest version.