



Australian
National
University

ANU Self-Assurance Report

Response to TEQSA Notice of Compliance
Assessment (Ref: CA0452)

August 2025

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Background

ANU Council

ANU Council (the Council) is established as the governing body of ANU by section 8 of the [Australian National University Act 1991](#) (the ANU Act). The authority, responsibilities and operation of the Council are set out in the [Council Charter](#) (the Charter). The Charter states that the Council: “has oversight of the University and is responsible for its mission and strategic direction, ensuring effective overall governance and management, and responsible finance and risk management” (section 4); and is responsible for the “approval of the annual report, including the annual financial statements and annual performance statements” (section 6.2(p)). As set out in the [Australian National University \(Governance\) Statute 2024](#) (the Governance Statute), the Council meets at least six times per year. In 2024, the Council met 8 times, and in 2025 the Council has met 5 times to date, with a further 4 meetings scheduled for the remainder of the year.

The Council fulfills its obligations and maintains control of the University with support from the Committees of the Council. The Committees provide independent assurance, advice and assistance to the Council on key matters, and include (but are not limited to) the [Audit, Finance and Risk Committee](#) (AFRC), the [Campus Planning Committee](#) (CPC), the [Investment Committee](#) and the [Safety and Wellbeing Committee](#) (SWC). The Committees provide a minimum of one report to the Council each year, as well as a summary of each committee meeting to the next occurring Council meeting.

The composition of the Council is set out in the [ANU Act](#) (section 10). Current Council members and vacant roles are outlined on the [Council webpage](#). Membership includes the Chancellor, Vice-Chancellor, nominees from academic and professional staff (elected via a voting system in accordance with the [Governance Statute](#) and the [Australian National University Governance Rule 2023](#), undergraduate and postgraduate representatives elected by students from the student body, and seven independent members appointed by the Minister. The Council draws on a broad range of expertise from its members, including independent nominees with high levels of relevant financial and commercial expertise. All Charters for Committees of the Council require diverse and expert membership, including independent nominees.

The Chair of the Council is the University’s Chancellor, currently the [Honourable Julie Bishop](#), who commenced on 1 January 2020, replacing the Honourable Gareth Evans (2010-2019). The Council appointed [Distinguished Professor Genevieve Bell](#) as Vice-Chancellor, commencing on 1 January 2024. She replaced Distinguished Professor Brian Schmidt, who served in the role from 2016 to 2023, ending his term two years early.

In addition to the approval of the University’s Annual Report, Corporate Plan and budget, the Council regularly receives reports on, and discusses, information security, Workplace Health and Safety (WHS), staff and student safety and wellbeing, University finances, University rankings and progress towards Key Performance Indicators in the Corporate Plan. The Council also receives regular reports about a range of issues.

ANU Executive Leadership Team

The [ANU Act](#) (section 34) identifies the Vice-Chancellor as the Chief Executive Officer of the University. The Governance Statute (section 55) also identifies the Vice-Chancellor as the “principal academic officer” and states that they are responsible for the “academic standards, management and administration of the University.” Beyond these powers, the Council delegates a wide range of appropriate authority to the Vice-Chancellor to enable the day-to-day management of the University. These delegations are managed through the University’s Delegations Framework.

The Vice-Chancellor is supported by an Executive Leadership Team. In the context of this Self-assurance Report, the University has taken the Executive Leadership Team to include the positions outlined in Figure 1, noting that this differs from that included in the University’s Annual Report.

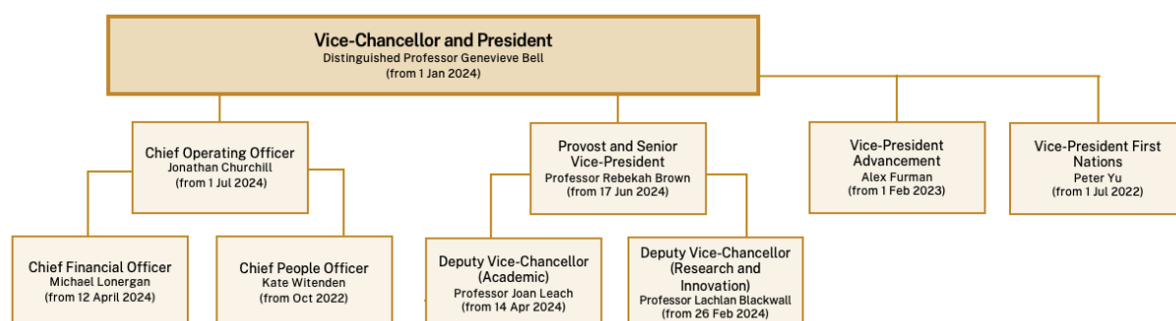


Figure 1 – ANU Executive Leadership Team

While the majority of the Executive Leadership Team are relatively new to their positions, they bring extensive experience to their roles from both within, and external to, ANU and the sector. The Executive Leadership Team supports the Vice-Chancellor through their participation on the Strategic Leadership Group (SLG), an advisory board for institutional strategy, ensuring data-driven forward-looking guidance on critical matters. SLG membership also includes College Deans, and other senior professional leaders such as the Chief Marketing and Communications Officer and the Chief Campus Environment Officer. A wider group of university leaders which includes members of SLG, the University Leadership Group (ULG) also meets regularly.

Council's oversight of the University's financial position

The Council has been aware of recurring underlying operating deficits since 2020 and has monitored the University's financial position and implemented mitigation strategies throughout this time. ANU reported underlying operating deficits in the Annual Reports for [2020](#) (\$80m), [2022](#) (\$115m) and [2023](#) (\$108m). The [2024](#) Annual Report shows a further underlying operating deficit of \$142m, originally forecast to be \$60m. ANU did not report an underlying operating deficit in [2021](#), due to the receipt of a one-off sector wide Research Support Program grant, provided by the Federal government to address challenges of COVID-19.

The reasons for the underlying operating deficit are complex and varied. Matters of significance over the last eight years include:

- The 2017-2021 Strategic Plan called for a carefully curated and diverse student cohort, a reduced overall student headcount, and a projected increase in philanthropic donations. The initiatives to deliver on the diverse and reduced overall student cohort were implemented in 2018 and began to have an impact on commencing student numbers in 2019.
- In 2017, plans were initiated to commence a \$1b philanthropic campaign over the following ten years. This was to help underwrite the budget shortfall brought about by the overall reduction in student headcount. The campaign never eventuated and was quietly abandoned in late 2022.
- In late 2019 through to early 2020, the University was impacted by smoke pollution from significant fires on the East Coast of Australia, and in January 2020 the University experienced a supercell hailstorm, resulting in significant damage to buildings, for which building repair works remain ongoing to date. Both events caused significant disruption to activity on the Acton campus, including campus shutdowns, and resulted in \$6.7m in unplanned immediate expense to respond to the events. This is in addition to the significant and far-reaching impacts on staff, students and overall productivity.
- In 2020, COVID-19 began impacting the University, including immediately compromising the ability to meet the new student load targets due to closed inter-state and international borders, and broader impacts on university finances.
- During the first half of 2020, the University immediately enacted a range of support measures to ensure the most vulnerable and impacted students were supported, including emergency funding to ANU student associations, travel bursaries, covering the cost of early termination of accommodation contracts, and the extension of Higher Degree by Research scholarships. This support resulted in \$60m in unplanned expenditure. A further \$8m in unplanned expenditure supported the University's transition to remote working and learning, commencing with the first ACT lockdown in March 2020.
- During 2020 and 2021, the University implemented the [ANU Recovery Plan](#) in response to the financial impact of COVID-19. The plan outlined the need to reduce expenses (including salary and non-salary expenses), raise revenue, carefully manage an operating deficit over the period 2021-2023, and increase the University's debt limit to \$800m.
- From 2021 to 2024, there was an 8.1% growth in expenses per year, while revenue only grew by 3.7% per year over the same period. By December 2022, staffing levels had increased to be higher than the levels seen before the implementation of the [ANU Recovery Plan](#), and continued to grow throughout 2023, reaching the highest level in early 2024. This growth in expenses was not matched by a planned growth in sustainable revenue, and overall student numbers remained broadly flat from 2022 to 2024. Growth in international student numbers during this period was impacted by government intervention (including international student caps), and market and geopolitical forces.
- During 2022 and 2023, the University negotiated the Enterprise Agreement (EA) 2023–2026, which followed a prior EA delivering at least 16% cumulative wage increase between 2021 and 2024. The current 2023–2026 EA includes a further 18% salary increase over its term. The EA was under negotiation concurrently with the preparation of the 2024 Budget and Forward Estimates, and was not approved by the Fair Work Commission until November 2023.
- The 2024 Budget and Forward Estimates prepared for the Council in December 2023 showed clear acknowledgement of the University's growing debt position, and outlined a strategy predicated on growing student numbers and lowering expenditure, to bring the University back to a sustainable financial model.

As demonstrated above, the University's current financial situation does not have a single underlying factor. The Council has consistently monitored the risks associated with the factors outlined, and implemented measures seeking to address the risks and underlying operational deficit, including during the budget preparation process and forward estimates over these years. Demonstration of this is clear in the 2023 Council meetings where risks were identified (i.e., student load, external pressures such as international caps) and two different versions of the budget were developed and discussed at the Council, including options for smaller deficits and growth targets before a final budget was approved. Consistent with the requirements of the [Public Governance, Performance and Accountability Act 2013](#) (PGPA Act), the University has consistently reported matters impacting on the University and its finances, as well as the ongoing underlying operational deficit, in its Annual Reports, which are provided directly to the Department of Education and the Parliament. In retrospect, despite ongoing and deliberate efforts of the Council and the University, the accumulation and complexity of the various underlying factors over the past few years has meant that the strategies implemented through to the end of 2023 were not successful in addressing the underlying operational deficit.

In early 2024, several initiatives were implemented to mitigate the unanticipated shortfall in revenue and higher than anticipated expenses including, but not limited to:

- Revising operational budgets across colleges and portfolios for the second half of 2024,
- Establishing a central recruitment approval committee to ensure staff appointments meet budget and strategic objectives,
- Centralisation of human resources, finance and ITS functions to ensure service organisations had single accountable owners, controls that can be standardised and deployed across the organisation for better compliance.

In August 2024, the Council tasked the Executive Leadership Team with reducing the overall recurring expenditure of the University by \$250m; including reducing \$100m in salary costs and \$150m in non-salary costs in order to achieve long term financial sustainability. This was emphasised by a set of financial risk appetite metrics (>5% operating margin, a cash floor of \$200m and an external debt limit of \$500m) endorsed by the Council which further influenced the ANU Budget approved by the Council for 2025.

In October 2024, the Executive Leadership Team launched a new program of work – [Renew ANU](#). [Renew ANU](#) involves a series of transformational initiatives aimed to reshape the University's structure and operating model to ensure long-term financial sustainability without compromising academic excellence or the national mission. While the program of work has taken a strategic, phased approach to organisational change, guided by clear principles and extensive consultation, it has been a significant cultural shift and has caused anxiety and uncertainty in the University community. Council has been regularly briefed about the progress of the work; and an internal governance board has maintained appropriate oversight.

As outlined above, the Council has identified and is addressing the risks that led to the University's current financial position, however, there remains work to be done to bring the whole University community along on this journey. Given the complexities with the University's finances, this involves continuing to work with the University community in an enhanced way to ensure the finances are more easily understood.

The culture of the University's Council and Executive Leadership

ANU, its leadership and the Council are committed to providing a safe, respectful and inclusive environment for its community. The University seeks to foster a culture of transparency, accountability and role clarity. As outlined in the *Background* section of this document, the Council and the Executive Leadership Team are distinct groups and have different responsibilities. The Council receives assurance on the activities and work of the Executive Leadership Team through regular reports and papers to the Council. This includes (but is not limited to) reports regarding the disclosure of interests, freedom of speech and academic freedom, and the management and monitoring of formal complaints, allowing the Council oversight of the culture, concerns and practices of the University and its leadership.

The approach of the University, and the Council, to:

- disclosure of interests is set out in the response to Standard 6.1.2a;
- academic freedom and freedom of speech is set out in the response to Standard 6.1.4;
- management and monitoring of formal complaints is set out in the response to Standard 6.2.1j.

ANU acknowledges the significant media attention about the University, the Council and members of the Executive Leadership Team over the past 12 months. ANU has commissioned an independent review of media relating to the University and it is clear that there has been negative media about the Vice Chancellor, the leadership more broadly and the Renew program of work. On [1 July 2025](#), the Vice-Chancellor wrote to the community taking responsibility for her actions in relation to a particular comment reported in the media.

ANU also acknowledges the two ‘Open Letters’ containing several hundred signatures of ANU staff in March and May 2025. The willingness of staff to attach their names to these letters demonstrates to the University that staff are not afraid to voice concerns about decisions by the University’s senior leadership. These letters were received and publicly responded to in demonstration of the University’s willingness to engage openly and honestly with feedback.

Across July and August 2025, the Vice-Chancellor has hosted a series of ‘Facing the Future’ discussions with members of staff concerning the ongoing Renew ANU program and future state of the University. In total, 13 sessions have been planned, with 9 delivered to date, including a total of 107 attendees across the sessions. The Vice-Chancellor continues to provide a range of avenues for feedback, engagement and conversation.

In September 2024, Professor Christine Nixon commenced a review into matters of Gender and Culture in the ANU College of Health and Medicine and its constituent Schools (the Nixon Review), considering matters from the establishment of the College through to the present day. The review was commissioned by the Vice-Chancellor and Provost, following persistent and ongoing concerns. The centralisation of the human resources function in July 2024 meant that these issues could no longer be hidden. The review was presented to the Council on 28 March 2025, and all recommendations were accepted in full. An overarching Steering Committee and several working groups have been established to implement the recommendations of the review. It is anticipated that Professor Nixon will return to the University in January 2026, and again in October 2026, to monitor the progress of the implementation of the recommendations. The establishment of the Nixon Review, and ongoing monitoring of implementation, demonstrates the Council and Executive Leadership Team’s willingness to accept where significant concerns exist, to fully investigate matters, and a commitment to implement whole of institutional changes to improve the culture and practices where required.

ANU values and encourages feedback from the University community through a range of mechanisms. The [Enterprise Agreement 2023-2026](#) provides the framework for undertaking organisational change, and includes pre-consultation and consultation stages. Each [Renew ANU](#) change plan released includes a WHS risk analysis, including psychosocial harm that may be experienced by impacted staff and students. The University has participated in two conferences before the Fair Work Commission to seek to resolve disputes lodged by the National Tertiary Education Union (NTEU) in relation to [Renew ANU](#). To date, there has been no finding of wrongdoing against the University.

Over the course of [Renew ANU](#), the University has received significant feedback from staff, indicating again that they are not afraid to voice concerns about decisions made by the Executive Leadership Team (see Table 1 below). While the University has collected quantitative data on engagement and feedback through the Renew ANU process, it has also undertaken an in-depth analysis of all qualitative feedback received through the consultation process. This analysis identifies any consistent themes, in addition to individual matters, which are relayed back to the University community through the final implementation plans.

Table 1: Engagement with Renew ANU Change Proposals

Renew ANU Change	Consultation Engagement		Feedback Submissions
	No. Times Change Proposal Opened	No. Views of T/Hall Recording	
2024 Research and Innovation Portfolio Change Proposal	1718	354	108
2024 Facilities and Services Division Change Proposal	1323	410	11
2024 ANU Academic Portfolio Change Proposal	1944	316	103
2024 Academic College Realignment Change Proposal	1206	3816 (recording) 7460 (attendees)	257
2024 College of Health and Medicine Change Proposal	1716	526	83
2025 Proposed Principles for Change Proposal	4000+	153	145
2025 ITS/ISO Change Proposal	1827	484	183
2025 PSP Change Proposal	1804	232	61

Standard 6.1.2a

All current members of the Council meet the fit and proper person requirement. Section 11 of the [ANU Act](#) sets out the qualifications for membership on the Council. All Council members undertake an induction program,

with each induction tailored to suit the skills and experience of the inductee and any specific knowledge they require ([Council Charter](#) clause 17). In addition, all Council members are given the opportunity to undertake professional development activities to assist them in fulfilling their duties and responsibilities, including completing the Foundations of University Governance course delivered by the Australian Institute of Company Directors.

Clause 12.1 of the [Council Charter](#) states that “Council members are considered “officials” for the purposes of the PGPA Act, and expected to adhere to their legal duties of... Duty to disclose interests”. Further to this, the [Council Charter](#) (clause 12.2) sets out the requirements and expectations of Council members, stating that “Council ... members are required to take all reasonable steps to avoid actual, potential or perceived conflicts of interests”. As part of the appointment and induction process, new Council members are required to complete a 'New Council Member Disclosure and Declaration' form. This form requires new members to disclose any potential conflicts of interest, as well as respond to questions in relation to the 'Fit and Proper Person Requirements'. All current members of the Council have completed the 'New Council member Disclosure and Declaration' form.

The University Governance Office (UGO) maintains a register of all material personal interests that are declared by Council ([Council Charter](#) clause 12.2), and Council Committee members. On an annual basis, the University Secretary invites members to make a declaration of any further material personal interests or to amend existing declarations. These are recorded in the register and presented to Council for noting at least annually. The register was most recently presented to the Council at its meeting on 28 March 2025. At each Council meeting, members are reminded of their obligations under the [PGPA Act](#), and are asked to disclose any interests, which are recorded in the meeting minutes ([Council Charter](#) clause 12.2). Where a member has a conflict of interest in relation to an item on the agenda, that member does not participate in the discussion and decision making related to that item of business.

Noting recent media scrutiny regarding the disclosure of interests by members of the Council, ANU has confirmed that the Vice-Chancellor has disclosed interests and declared all conflicts appropriately, and as required. The Vice-Chancellor was appointed to the Nominations Committee in 2021, and became a member of the Council on 1 January 2024. As required, all conflicts of interest have been declared and included on the Declaration of Interests Register since 2021 and have been shared with the Council annually. The Council minutes do not record any questions being raised by members of the Council in relation to the Annual Disclosure of Interests reports.

Section 15.1 of the [ANU Act](#) sets out how a Council member's office (other than an *ex officio* member) may be vacated prior to the expiry of their term. This includes where a Council member “(a) becomes disqualified under section 11 from remaining a member of the Council; or... (j) is or becomes disqualified from managing corporations under Part 2D.6 of the *Corporations Act 2001*; or... (l) is, in the Council's opinion, incapable (other than on a temporary basis) of performing his or her duties”.

As detailed in [TEQSA's guidance](#), determining the fitness and propriety of a person includes “whether the person has the confidence of peers, colleagues, clients, and the public at large to not engage in improper conduct in the discharge of their professional duties”. The [Governance Statute](#) states that where the Chancellor, Pro-Chancellor, or Vice-Chancellor no longer have the confidence of the Council, the Council can pass a resolution of no confidence at a Council meeting. A resolution of no confidence is passed where at least a two-thirds majority of the Council members support the resolution.

ANU acknowledges the NTEU's online survey that was undertaken in March 2025, which concluded with a “vote of no confidence” in the Chancellor and Vice-Chancellor. At Council's next meeting on 28 March 2025, the Council discussed the NTEU online survey and an open letter from the community. Council confirmed that it did have confidence in the Chancellor and Vice-Chancellor to perform their duties. Council also confirmed its desire to be more engaged with, and listening to, the concerns of the community in an ongoing way. While one Council member indicated at that meeting that they did not share Council's confidence, they did not wish for the matter to go to a formal vote. ANU staff were informed by email on 28 March 2025 that the Council had reaffirmed its support for the Chancellor and Vice-Chancellor.

Beyond the Council, there has also been expressions of support for the Chancellor, Vice-Chancellor and the College Deans. On 6 December 2024, the ANU leadership team wrote to the ANU community affirming their support for the Chancellor, Vice-Chancellor, and the Council. This email was signed by the Provost, Chief Operating Officer, Vice-President (Advancement), Vice-President (First Nations), Deputy Vice-Chancellor (Academic), Deputy Vice-Chancellor (Research & Innovation), Chief Financial Officer, Chief People Officer, Chief Marketing & Communications Officer, Chief Information Officer and Chief Campus Environment Officer.

Standard 6.1.3a

As the governing authority, the primary functions of the Council are: strategic oversight of the University; ensuring effective overall governance and management of the University; and ensuring responsible financial and risk management of the University.

The Council has established Committees of Council to assist with the acquittal of specific responsibilities, and advising, reporting and making any necessary recommendations to the Council ([Council Charter](#), clause 5). ANU recently undertook a holistic review of all Committees of Council and consolidated committees where there was significant duplication (i.e., the Finance Committee and Audit and Risk Management Committee were consolidated into the Audit, Finance and Risk Committee), and refreshed the Committee Charters.

As detailed in the response under Standard 6.2.1a, ANU undertakes robust, independent and objective internal audits each year in accordance with a Council-approved three year Rolling Internal Audit Work Plan. In addition, the [Council Charter](#) (clause 15) states “The Council has the authority to conduct or direct any investigation required to fulfil its responsibilities and has the ability to retain, at the University’s expense, such legal, accounting or other advisers, consultants or experts as it considers necessary from time to time in the performance of its duties. All Council Committees have access to independent professional advice on this basis”.

There has been an increasing diversity of voices and reporting to the Council, including (but not limited to) reports from the Provost, the Chief Operating Officer, and College Deans, as well as educational and informational sessions on University rankings and Freedom of Information. Further information sessions for the Council, including on academic freedom and freedom of speech, are planned.

The seven independent external nominees of the Council are recommended by the [Nominations Committee](#) and appointed by the Minister for Education. Recommendations to the Minister consider the balance of gender, appropriate representation of Indigenous Australians, a balance of members from across the States and Territories of Australia and relevant skills and experience including sufficient financial and commercial expertise. External members of the Council provide ANU governance with Australian and world leading experience in governance, science, finance, accountancy, public administration and social inclusion. The diverse makeup of the University’s Council, bringing together experienced non-executive members from across Australia and various industries, combined with elected internal members of varying levels of familiarity with Board operations, is a strength, bringing a diversity of views and experiences in the common goal of delivering what is best for the University. All Charters for Committees of the Council require diverse and expert membership including independent members appointed by the Council, and may also include members of the University Executive, elected members of staff to Council and student representatives (as appropriate).

The Council evaluates its performance “at intervals of two years in a manner determined by the Chancellor that addresses the Council’s acquittal of its governance responsibilities” ([Council Charter](#), clause 20). In 2022, it was determined that this evaluation would be undertaken by an external reviewer, and the review report was presented to the Council in 2023. A working group was established to determine which recommendations would be implemented to enhance the Council’s performance. At its meeting in August 2025 the Council discussed the manner of its next review. The University notes that the Australian National Audit Office (ANAO) will be potentially undertaking a performance [audit](#) in 2025-26 to assess the effectiveness of the University’s financial management framework, and processes to support the Council, Committees, Vice-Chancellor and other senior executives to make informed decisions.

The Nixon Review and subsequent report provided to the Council also demonstrates that the Council receives and uses independent advice to inform decision making and direction setting.

Standard 6.1.3e

The minutes of Council meetings, and Committees of Council, are a true and accurate record of the business, and record not only the decisions taken but also the basis on which decisions are made. The University Secretary prepares all Council minutes under the direction of the Chancellor ([Council Charter](#) clause 11.3). For committees of Council, the minutes are prepared by the Secretary, a staff member of the UGO, and are authorised by the Chair prior to approval being sought from the Committee at the next meeting. For Council (and Committees of the Council), minutes are included in the agenda papers for the following meeting, which are ordinarily distributed to members at least seven days prior to the meeting ([Council Charter](#) clause 11.3).

The first order of business at each Council meeting, following completion of all preliminary matters, is consideration of the minutes of the previous meeting ([Standing Orders of the ANU Council and Council](#)

[Committees](#) (Standing Orders) clause 8). Council members are provided an opportunity to raise any questions in relation to the accuracy of the minutes, and after any revisions to the minutes (as agreed by the majority of members present), the minutes of the previous meeting are confirmed and signed by the Council Chair ([Standing Orders](#) clause 9). Following each Council meeting, non-confidential minutes are published on the [ANU Council webpage](#) ([Council Charter](#) clause 19).

As noted under the response to Standard 6.1.2a, at each Council meeting, and Council Committee meetings, members are reminded of their obligations under the [PGPA Act](#) to disclose any interests or conflicts of interest, which are recorded in the meeting minutes (see [Council Charter](#) clause 12.2). As the Accountable Authority of a Corporate Commonwealth Entity the minutes of the Council are stored on the University's Electronic Records Management System and ultimately stored in perpetuity as National Records.

In early 2025, the Council reviewed how it prepared minutes and adopted an approach where the minutes succinctly record the decision taken, and the basis on which the decision was made. This aligns with expectations set out in the [Joint statement on board minutes](#) issued by the Australian Institute of Company Directors and is in keeping with the expectations of Council members with experience of corporate governance.

Standard 6.1.4

As set out in the ANU [Enterprise Agreement 2023-2026](#) (section 20), it is recognised that the exercise of academic freedom and freedom of speech are defining features of, and fundamental to, the operation of the University. The University's [Academic Freedom and Freedom of Speech policy](#) outlines the policy framework for ensuring the protection of academic freedom and freedom of speech, and outlines the rights and responsibilities of members of the Council and the University community in relation to academic freedom and freedom of speech. This includes a positive duty to foster the wellbeing of staff and students.

Academic Board's responsibilities include: "... (h) developing and promoting principles pertaining to academic freedom within the ANU and of its staff, students and official visitors" ([Academic Board Charter](#) clause 25). Academic Board monitors and oversees the risks relating to academic freedom via Academic Risk Monitoring Report submitted to each meeting. At Meeting 3/2024, the Board noted that the [Academic Freedom and Freedom of Speech policy](#) had been applied and tested in several recent matters and there was evidence that it was working effectively. In 2024, the Academic Board Chair provided advice to the Vice-Chancellor on several matters regarding the application of the [Academic Freedom and Freedom of Speech policy](#). In their assessment of the application of the policy in several complex academic freedom matters, the Academic Board Chair found that the policy was robust and well-integrated into the ANU policy suite. To assist Academic Board in fulfilling its responsibilities, it has established an Academic Freedom Expert Reference Group, which is stood up as needed.

The Council receives an Annual Attestation Statement on Freedom of Speech and Academic Freedom, prepared by the Chair of Academic Board. This statement notes that in 2022 the Academic Board initiated an annual academic freedom report for review and discussion of issues of freedom of speech and academic freedom over the course of the year. The Academic Board Chair delivered a verbal report to meeting 6/2024 of the Board on 27 November 2024. This annual report provides a mechanism to monitor issues, should they arise, and any emerging trends that require consideration.

In early 2025, ANU implemented a new [Posting on ANU Campus policy](#), which aims to promote freedom of speech and freedom of expression by ensuring that campus users can share visual material around the ANU Campus, while maintaining a clean and welcoming physical environment. In addition, the [University Physical Security – Internal Campus Buildings and External Site Operations policy](#) sets out the principles that support the University in providing a safe and secure working and learning environment for its staff and students. Both policy documents were submitted to the Council for noting.

The University is currently undertaking a review of the Student Disciplinary Framework to ensure alignment with evolving legal requirements, sector best practices, and institutional values. This includes ensuring compliance, promoting equity, safety and inclusion, supporting academic freedom and freedom of speech, and enhancing operational efficiency. This project is being overseen by the [Student Disciplinary Framework Review Project Board](#) which provides regular reports to the Vice-Chancellor and the [Safety and Wellbeing Committee](#) with a final recommendations report expected by late 2025.

Formal complaints in relation to academic freedom and freedom of speech are managed in accordance with the University's Staff grievance [policy](#) and [procedure](#), and the Student grievance and complaint resolution [policy](#) and [procedure](#), and with reference to the [Staff](#) and [Student](#) Codes of Conduct.

Standard 6.2.1a

The University provides assurance of its compliance with legislative requirements, including those outlined in the [ANU Act](#), through an annual Conformance Statement presented to the Council. This ensures that the Council, as the corporate governing body of ANU, has strategic oversight of governance and compliance activities. Prepared by UGO, the statement details the University's conformance, areas where compliance can be strengthened, and any remediation actions required, against individual sections/standards of the following documents: [Australian National University Act](#); [Public Governance, Performance and Accountability Act](#); [Public Governance and Accountability Rule](#); [Higher Education Standards Framework \(Threshold Standards\): Part 6 Governance and Accountability](#); [Voluntary Code of Best Practice for the Governance of Australian Universities](#) (Note: this has been superseded by "[A Code of Governance Principles and Practice for Australia's Public Universities](#)" endorsed by the University Chancellors Council in December 2024. Conformance with both codes was included in the 2024 report).

The 2024 Annual Conformance Statement noted that the Council receives a WHS report at each meeting, in addition to a WHS Annual Report. The regular WHS reports, along with the annual WHS report, provide statistics, information and analysis to the Council in relation to WHS incidents and hazards, injuries and early intervention assistance, workers' compensation claims, internal WHS audits undertaken and employee relations matters.

To support the University in managing and maintaining compliance, the UGO has established an Obligations Directory containing a comprehensive list of legislation the University must comply with. The directory identifies the University Executive responsible for overseeing compliance and notes regular compliance reporting activities.

To discharge its responsibility under Section 16 of the [PGPA Act](#) (that the accountable authority maintains appropriate systems of risk oversight and controls), the University undertakes robust, independent and objective internal audits each year in accordance with a Council-approved three year Rolling Internal Audit Work Plan, developed in consultation with the Executive and key stakeholders, including the [AFRC](#). The audits are undertaken by external organisations, with final reports being submitted to [AFRC](#) for consideration. The [AFRC](#) maintains oversight of the implementation of review recommendations and approves the closure of audit recommendations upon receipt of evidence of implementation. The Council receives annual reports from [AFRC](#) in relation to the Internal Audit Strategy, the audit schedule for the current year, as well as a report on the audits undertaken in the previous year. In the period 2019-2024, 35 internal audits took place, including: Review of casual Sessional academic staff remuneration and role expectations at the Australian National University; Governance of Foreign Interference; HESF Standard 2.3 Wellbeing and Safety; Student Wellbeing and Mental Health.

Standard 6.2.1d

The overall financial management of the University is a function of the Council, including approval of the annual budget and financial statements, in accordance with the [Council Charter](#) (section 6.2). The Chief Financial Officer presents at each meeting of the Council on the University's financial results, and regularly provides updates to the Council in relation to the annual budget setting process. In addition, the [AFRC](#) advises the Council on the University's annual budget, forward estimate projections and any implications arising for the University's budgetary position, as well as the compliance of annual financial statements with relevant regulations, and the appropriateness of financial reporting as a whole ([AFRC Charter](#), clause 14). The draft annual financial statements are considered and endorsed by the [AFRC](#) for transmission to the Council for approval. The final financial statements are signed by the Chancellor, Vice-Chancellor, and Chief Financial Officer, to formalise the statements' adoption by the Council.

The University's financial statements undergo an independent financial audit against Australian accounting standards, to confirm that they: comply with Australian Accounting Standards and the [Public Governance, Performance and Accountability \(Financial Reporting\) Rule](#); and present fairly the financial positions of the University and the consolidated entity as at 31 December (of the year being reviewed) and their financial performance and cash flows for the year then ended. The independent audit is undertaken by the ANAO. In the last five years, the ANAO has not requested any adjustments to the University's financial statements as a result of this independent audit. ANU publicly reports full audited financial statements annually, within the ANU Annual Report which is provided to the community following tabling in Parliament.

As shown in the **Background** section of this report, a number of staff within the Executive Leadership Team commenced at ANU in early 2024. A key reflection from this period of transition, particularly considered in the context of the University's financial position, is that the process for the handover of responsibilities between staff leaving and entering each of these key roles could have been significantly improved. This includes

documenting the expectations of staff vacating these roles, and the processes for ensuring staff appointed to these roles receive detailed handover documentation. The University has since updated its onboarding and offboarding procedures for members of the Executive Leadership Team, and continues to improve these processes iteratively.

Standard 6.2.1e

ANU manages a broad range of risks to its operations through a variety of appropriate systems, as outlined in the ANU Risk Management internal web page. Risk management at ANU is governed by a framework, which is established through the [Risk management policy](#), including identification, management, reporting and responsibilities. This policy and the systems it establishes are designed in accordance with section 16 of the [PGPA Act](#), the [Commonwealth Risk Management policy](#), and the [Australian and New Zealand Standard ISO 31000: 2018 Risk Management](#). The Risk management policy is supported by other policies and procedures relating to the management of risk, and embeds risk management into University processes (i.e., the [Work health and safety policy](#), and [Fraud and corruption control policy](#)).

As outlined in the [AFRC Charter](#) (clause 3), the committee “provides independent assurance and advice to the Council on the appropriateness of the University’s system of risk oversight, internal controls, audit, annual financial reporting, and general compliance, and monitors and advises the Council on the University’s management of its financial resources, subsidiaries, significant equity interests and other commercial activities”.

Risk registers are a key mechanism ANU uses to identify, manage and mitigate risks at a range of levels throughout the University, as per the ANU Enterprise Risk Management Framework (ERMF). Each register presents current risk level, causes, consequences, controls and treatments. These include:

- The ANU Strategic Risk Register: details highest level strategic risks to the University and how these impact specified strategic objectives. The Register is reviewed annually, and following endorsement by the [AFRC](#), is presented to the Council for approval, as per the [Risk management policy](#) (clause 4). The Register presents the current risk level, causes, and consequences. Strategic risks listed relate to a range of issues, including financial resourcing, information security, foreign interference, and student satisfaction.
- Academic Board Risk Register and Monitoring Report: details the four academic risks for which the Academic Board has responsibility. The report is a standing item on the agenda at every Academic Board, and is starred for discussion twice a year.
- Operational Risk Registers for Colleges and Portfolios: The registers are developed and reviewed on a 6-monthly basis by Service Division Directors and General Managers, in accordance with the ANU ERMF. Risks identified as high or extreme are reported to the Executive of that portfolio, with other risks managed at a local area level ([Risk management policy](#), clause 5). The Executives report any strategic risks to the AFRC, in accordance with the ERMF.

As set out in the ERMF, the Council approves the University’s Risk Appetite Statement, a dynamic document that is reviewed at least every two years. The Risk Appetite Statement explicitly states the types of risks the University is willing to accept in pursuing its vision and key initiatives as articulated in the ANU Strategic Plan. To guide the initial response to the impacts of COVID-19 the financial risk appetite threshold was revised by the Council in 2021. The Financial Risk Appetite Statement was most recently noted at the Council in August 2024, and set out the risk appetite methodology to be incorporated within the University’s 2025 Budget.

ANU has appointed a Chief Risk Officer (CRO), who commenced in July 2025. The CRO’s role is to provide strategic guidance to the University leadership, shape and lead the University’s risk management framework, foster organisational resilience, and drive transformation and excellence in risk management.

Additional information in relation to the Council’s oversight, ongoing management and mitigation of risks related to the University’s financial position are outlined earlier in this document under the section *Council’s oversight of ANU’s financial position*.

Standard 6.2.1j

The University monitors the occurrence and nature of formal complaints and disclosures, and takes action to address underlying causes. The University has a number of mechanisms available for the management of complaints and disclosures, dependent on the nature of the matter. This includes lodging:

- a [Public interest disclosure](#) in accordance with the [PID Act](#) and the ANU Public interest disclosure [policy](#) and [procedure](#),

- a complaint in accordance with the [Privacy Policy](#);
- a complaint in accordance with the Staff grievance resolution [policy](#) and [procedure](#);
- a grievance or complaint in accordance with the Student grievance and complaint resolution [policy](#) and [procedure](#);
- a complaint in accordance with the University services feedback [procedure](#) via the [University feedback form](#);
- a WHS incident/hazard report via the [Figtree reporting tool](#);
- a disclosure of harmful behaviour via the [ANU Online Disclosure form](#); or
- a [Formal report of student \(non-academic\) misconduct](#) under the [ANU Discipline Rule 2021](#) to the University Registrar.

The University acknowledges that its policy suite has not clearly articulated pathways for the submission, and management, of concerns or complaints against senior leadership of the University. As the University continues to turn its attention to the management of psychosocial risks and hazards, it is evident that the complaint and escalation pathways and mechanisms need to be clearly defined and articulated to members of the University community. The University notes that the Nixon Review recommended the establishment of a staff ombudsman, which is currently being considered, and is a mechanism that could manage these complaints.

In addition to iteratively improving policies and processes in response to complaints and disclosures, the University maintains oversight of complaints and disclosures, through regular reporting to Academic Board and Council. These reports include:

- Public Interest Disclosure (PID) Annual Report: a report to the Council on the number of disclosures received under the PID Act in the preceding financial year.
- Privacy Annual Report: annual report on the management of privacy matters. The report includes information about privacy complaints received each year since 2020, including from the Officer of the Australian Information Commissioner.
- WHS Reports: a detailed WHS report is submitted to each Council meeting, providing an update on the University WHS performance for the preceding period. The WHS annual report is presented to the Council and reports on the University's WHS performance, provides work health and safety statistics, and includes information about WHS complaints received in the previous year.
- Student Safety and Wellbeing Report: a report submitted to each Council meeting, providing an update on activities and matters related to student safety and wellbeing.
- Discipline Cases Annual Report: a report to Academic Board on student discipline cases, including allegations of misconduct, from the preceding year. These relate to matters covered by the [ANU Discipline Rule 2021](#), including sexual assault and sexual harassment, fraud, bullying, and other misconduct.
- Appeals Annual Report: a report to Academic Board on student appeals against academic decisions, including complaints, from the preceding year. These relate to complaints considered under the Formal Resolution processes in the Student grievance and complaint resolution policy and procedure, and includes reviewable decisions and/or appeal processes under the *Discipline Rule 2021*.

ANU acknowledges the recent media reports claiming that staff are afraid to voice concerns about decisions made by members of the Executive Leadership Team. However, the relevant feedback and complaints data shown below in Table 2, demonstrates that the number of complaints across the various mechanisms have remained steady, or slightly increased, indicating that staff and students feel able to raise concerns and that new psychosocial risk and hazard reporting has been introduced.

Table 2: Number of complaints and feedback received for the period 2021-2025 (YTD)

Complaint/Feedback Type	2021	2022	2023	2024	2025 (YTD)
Public Interest Disclosure (FY / Allocated)	4	0	1	2	-
Privacy (OIAC/Internal)	1/7	1/0	0/8	0/0	-
Figtree Hazards Reports (incl. psychosocial harm)	125	119	128	140	80
Figtree Incident Reports (incl. psychosocial harm)	285	337	474	487	257
Student Disclosures	366*	204	157	132	57
Student Reports	58	104	147	99	53

*the reporting period for this was Oct 2020-Sept 2021