

# External Referencing and Benchmarking Policy and Procedure

## Associated Information

|                                                       |                                                                                                                                                                                                                                                                                                                                    |
|-------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Approving body</b>                                 | Academic Board                                                                                                                                                                                                                                                                                                                     |
| <b>Date approved</b>                                  | 12 August 2026                                                                                                                                                                                                                                                                                                                     |
| <b>Date of effect</b>                                 | Commencement of operation                                                                                                                                                                                                                                                                                                          |
| <b>Next scheduled review</b>                          | Three years from when policy commences                                                                                                                                                                                                                                                                                             |
| <b>Policy owner</b>                                   | Chief Executive Officer (CEO)                                                                                                                                                                                                                                                                                                      |
| <b>Policy contact</b>                                 | Chief Executive Officer (CEO)                                                                                                                                                                                                                                                                                                      |
| <b>Related Documents</b>                              | <a href="#">Quality Assurance Framework</a><br>AI Framework                                                                                                                                                                                                                                                                        |
| <b>Related Legislative and Regulatory Instruments</b> | HESF 2021 — ss.5.3.1, 5.3.3, 5.3.4, 6.1.3, 6.3.1, 6.3.2, 6.3.3<br>Australian Qualifications Framework (AQF)<br>Tertiary Education Quality and Standards Agency Act 2011 (Cth) (TEQSA Act)<br>Education Services for Overseas Students Act 2000 (Cth) (ESOS Act)<br>Education Services for Overseas Students Regulations 2019 (Cth) |

## Purpose

1. The External Referencing and Benchmarking Policy and Procedure sets out the approach that Zenith Innovation Institute (**Zenith / ZII / the Institute**) will adopt towards external referencing including benchmarking its operations and activities.
2. By comparing how it operates with others in the higher education sector, the Institute can maintain and improve on the way it operates.
3. For the purpose of this Policy, the following definitions apply:
  - (a) **External referencing**- a process through which a higher education provider compares an aspect of its operations with an external comparator(s).
  - (b) **Benchmarking** - a structured, collaborative learning process for comparing practices, processes or performance outcomes.

## Scope

4. This Policy applies to:
  - (a) all Zenith staff, academic and corporate (full-time, part-time, casual or contract)
  - (b) members of all governing bodies and
  - (c) all TEQSA accredited courses.

## Policy

5. To ensure Zenith operates consistent with sector best practice, a range of external referencing activities will be undertaken to compare with other private higher education providers and peer and aspirational institutions the following matters:
  - (a) student outcomes
  - (b) course structure and content and
  - (c) processes, resources and structures (operational and governance).
6. The results from external referencing will be used as part of continuous improvement to improve the student experience through changes in teaching and learning, governance and operations.

## Types of external referencing

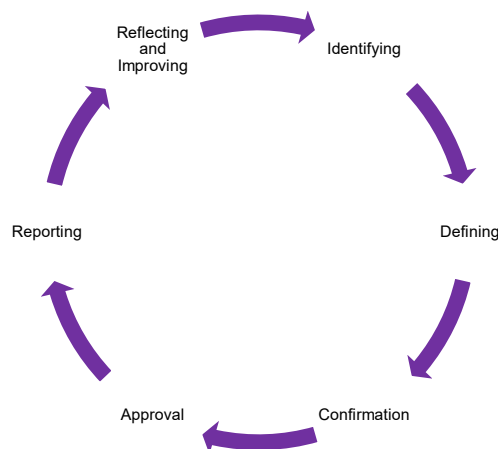
7. The purpose of external referencing is varied, but typically includes:
  - (a) providing evidence of the quality and standing of a provider's operations
  - (b) offering an external evidence base as context for the development of internal improvements to student outcomes and
  - (c) establishing or fostering collaborative improvement across providers.
8. A number of approaches and techniques can be used for external referencing, including peer review, moderation and benchmarking.
9. Benchmarking is the most common example of external referencing and at the broad level and can be organisational, relative to the course, process outcomes and best practice.
10. A more detailed analysis on the types of benchmarking is included below.

## Types of benchmarking

11. The Institute may undertake benchmarking with similar providers on the following aspects of its operations:
- (a) **Course** – course structure and content, entry criteria, learning outcomes and assessment methods
  - (b) **Policies and frameworks** – comparing academic and non-academic policies
  - (c) **Process** – comparison of particular processes and practices, e.g. complaint resolution time
  - (d) **Student outcomes** – comparing outcomes data, e.g. student attrition, progression, completion and
  - (e) **Structures** – comparing company structure, e.g. academic staffing, corporate services, governance.
12. Benchmarking can be undertaken through:
- (a) **Desktop audits** – audit of publicly available information and data, including but not limited to:
    - (i) providers' websites
    - (ii) higher education data from the Department of Education (DoE) and
    - (iii) Quality Indicators for Teaching and learning (QILT).
  - (b) **Formal arrangement** – formalising a benchmarking agreement:
    - (i) with a provider offering courses in similar disciplines and
    - (ii) through participating with QILT or similar industry/sector collaboration (e.g. the Higher Education Private Provider – Quality Network).

## Procedures

13. External referencing will be conducted according to the following stages:



| Stages                           |                                                                                                                                                              |
|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Stage 1 Identifying              | Identifying areas for improvement and/or good practice, e.g. entry requirements, course learning outcomes.                                                   |
| Stage 2 Defining                 | Define the type of and method for external referencing, e.g. course benchmarking using a provider's website.                                                 |
| Stage 3 Confirmation             | Confirm availability of staff with relevant knowledge and skills for the external referencing exercise.                                                      |
| Stage 4 Approval                 | If required, receive approval from the Academic Board (AB) for a formal benchmarking arrangement.                                                            |
| Stage 5 Reporting                | Report external referencing outcomes to management or relevant governing body, including identifying improvement plans.                                      |
| Stage 6 Reflecting and Improving | Reflect on feedback and outcomes to identify strengths and areas for enhancement, implementing improvements to ensure continuous development and excellence. |

14. Appendix 1 provides a schedule of external referencing activities.
15. We are committed to complying with all relevant data protection regulations and implementing robust safeguarding practices as part of our external benchmarking policy

## Responsibilities

16. The AB is responsible for:
  - (a) setting institutional benchmarks for academic quality and outcomes and
  - (b) monitoring the implementation of actions taken to improve the Institute's operations.
17. The CEO with support from the Academic Dean (academic-related activities) is responsible for:
  - (a) overseeing external referencing activities and
  - (b) reporting to the GB on outcomes from external referencing, including recommending actions for improvement.
18. The Academic Dean is responsible for:
  - (a) overseeing academic-related external referencing activities and
  - (b) reporting to the AB on outcomes from external referencing, including recommending actions for improvement.
19. All staff are responsible for:
  - (a) undertaking external referencing activities in accordance with this policy, when requested
  - (b) awareness of developments in external referencing practices and
  - (c) implementing improvements arising from external referencing in their areas of responsibility.
20. The Academic Dean prepares an annual self-assurance report on matters arising under this Policy, including outcomes data, identified risks, and improvement actions. This report is

presented to the Academic Board and a de-identified summary is provided to the Governing Board.

## Definitions

21. For the purposes of this Policy and Procedure, the following terms are defined as follows:

| Term                 | Definition                                                                                                                                                           |
|----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| External referencing | A process through which a higher education provider compares an aspect of its operations with an external comparator(s).                                             |
| Benchmarking         | A structured and collaborative quality assurance process for comparing practices, processes or performance outcomes. Benchmarking is a type of external referencing. |
| Governing body       | Includes the Governing Board (GB) and the Academic Board (AB), and any other committees established under Zenith's Governance Instruments.                           |
| Provider             | A TEQSA-registered 'Institute of Higher Education'                                                                                                                   |

## Version control

| Version | Changes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Approval Body       | Approval Date  |
|---------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|----------------|
| 1.0     | New Policy                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Academic Board (AB) |                |
| 1.1     | Point 13 updated to include "Reflecting and Improving"<br>Diagram updated from linear to circular<br>Point 5 updated to "To ensure Zenith operates consistent with sector best practice, a range of external referencing activities will be undertaken to compare with other private higher education providers and peer and aspirational institutions the following matters"<br>Point 15 added "We are committed to complying with all relevant data protection regulations and implementing robust safeguarding practices as part of our external benchmarking policy."<br>AI Framework referenced in Related Documents | Academic Board      | 03 Apr 2024    |
| 1.2     | Added third-Party compliance and monitoring and self-assurance section                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | AB                  |                |
| 1.4     | Removed orphaned "Third-Party Compliance Monitoring" and "Monitoring and Self-Assurance" sections; self-assurance obligation integrated into body. HESF inline citations removed. Role                                                                                                                                                                                                                                                                                                                                                                                                                                    | Academic Board      | 12 August 2026 |



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|  | names and version numbers updated per Delegations Policy and Schedule. |  |  |
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## Appendix 1 – External referencing activities

| Type                    | Objective of external referencing                                                                                 | Frequency                                                                                                         | Type of external reporting          | Responsible officer            | Responsible body                  |
|-------------------------|-------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------------|-----------------------------------|
| Course                  | Course reviews including course and unit design, entry criteria, learning outcomes, assessment.                   | Annual review<br>Comprehensive review<br>(refer to the <i>Course Monitoring and Review Policy and Procedure</i> ) | Desktop audit<br>Formal arrangement | CEO / Academic Dean            | Academic Board                    |
| Course                  | Delivery, including technology-enhanced learning, availability of learning/library resources and learning support | Comprehensive review                                                                                              | Desktop audit<br>Formal arrangement | CEO / Academic Dean            | Academic Board                    |
| Policies and Frameworks | Academic and non-academic                                                                                         | At least once every three years                                                                                   |                                     | CEO / Academic Dean (academic) | Academic Board<br>Governing Board |
| Process                 | Academic misconduct cases, type, frequency                                                                        | At least once every three years                                                                                   | Formal arrangement                  | CEO / Academic Dean            | Academic Board                    |
| Process                 | Grievances and appeals, number, type, days to resolution, number of external appeals                              | At least once every three years                                                                                   | Formal arrangement                  | CEO / Academic                 | Academic Board<br>Governing Board |
| Process                 | SASH incidents, number, type, days to resolution,                                                                 | At least once every three years                                                                                   | Formal arrangement                  | CEO                            | Governing Board                   |



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| Type       | Objective of external referencing                                                                      | Frequency                       | Type of external reporting          | Responsible officer | Responsible body                  |
|------------|--------------------------------------------------------------------------------------------------------|---------------------------------|-------------------------------------|---------------------|-----------------------------------|
|            | number of external appeals                                                                             |                                 |                                     |                     |                                   |
| Process    | Student recruitment, source countries, market trends                                                   | At least once every three years | Formal arrangement                  | CEO / Academic Dean | Governing Board                   |
| Structures | Academic appointments including staff qualifications, professional development and promotion processes | At least once every three years | Desktop audit<br>Formal arrangement | CEO / Academic Dean | Governing Board                   |
| Structures | Academic staff-to-student ratio                                                                        | At least once every three years | Desktop audit<br>Formal arrangement | CEO / Academic Dean | Academic Board<br>Governing Board |
| Structures | Wellbeing and safety provisions and support services, including professional staff to student ratio    | At least once every three years | Desktop audit<br>Formal arrangement | CEO                 | Academic Board<br>Governing Board |
| Structures | Facilities, resources and infrastructure                                                               | At least once every three years | Desktop audit<br>Formal arrangement | CEO / Academic Dean | Governing Board                   |
| Structures | Governance bodies structure and Terms of Reference                                                     | At least once every three years | Desktop audit<br>Formal arrangement | CEO                 | Governing Board                   |



| Type             | Objective of external referencing                                                                                         | Frequency                       | Type of external reporting          | Responsible officer                              | Responsible body                  |
|------------------|---------------------------------------------------------------------------------------------------------------------------|---------------------------------|-------------------------------------|--------------------------------------------------|-----------------------------------|
| Structures       | Monitoring quality assurance mechanisms                                                                                   | At least once every three years | Desktop audit<br>Formal arrangement | CEO / Academic Dean                              | Academic Board<br>Governing Board |
| Structures       | Approach to student representation and involvement in deliberative decision making                                        | At least once every three years | Desktop audit<br>Formal arrangement | CEO                                              | Academic Board<br>Governing Board |
| Student outcomes | Student performance such as grade distribution, progression rates, retention rates, attrition rates and completion rates. | Annually                        | Desktop audit<br>Formal arrangement | CEO / Academic Dean                              | Academic Board<br>Governing Board |
| Student outcomes | Student feedback and satisfaction                                                                                         | Annually                        | Desktop audit<br>Formal arrangement | CEO / Academic Dean /<br>Academic teaching staff | Academic Board<br>Governing Board |
| Student outcomes | Moderation, e.g. external double marking of samples of assessment items                                                   | At end of each semester         | Formal arrangement                  | CEO / Academic Dean                              | Academic Board                    |
| Student outcomes | Graduate outcomes, graduate course satisfaction, graduate employment and further study                                    | Annually                        | Desktop audit<br>Formal arrangement | CEO / Academic Dean                              | Academic Board<br>Governing Board |