



**National
Student
Ombudsman**

Mind the gap

When institutional accountability
breaks down

Our investigation into administrative failures that
delayed a student's graduation more than 10 years



**An NSO
Investigation
Report**

September 2026

Contents

Complaint background.....	3
Investigation.....	4
Response	4
Remedial action	5
Reflection and commitments.....	5
Findings and recommendations.....	7
Finding 1: Chloe’s graduation was unjustly delayed for over 10 years due to significant maladministration by the University	7
Finding 2: Chloe’s student record was not accurate due to the University's maladministration.....	9
Finding 3: The University’s response to Chloe’s attempt to finalise conferral of her degree in 2023 was insufficient, wrong, and took an unreasonable length of time (18 months)	10
Recommendations.....	13
Appendix – The University’s response	16

Complaint background

In 2009, Chloe¹ enrolled in a Bachelor's degree at a higher education provider ('the University')² through Open Universities Australia (OUA). In 2012, after completing all required units of the Bachelor's degree, per advice from OUA, Chloe contacted the University to apply for graduation.

At the time, University staff informed Chloe that there was a unique process for OUA graduates; the staff member responsible for handling OUA graduations was on leave and would be in contact with her upon their return.

Over a period of several months, Chloe made multiple follow up inquiries with the University and on each occasion, the University told Chloe to wait as there were ongoing issues between the University and OUA. Throughout this period and in the years that followed, both the University and OUA assured Chloe that graduation could take place at any time, since she had met all the course requirements. At no time was Chloe informed of a 10-year limitation on degree conferral or graduation eligibility.

Due to these assurances, Chloe paused following up on her graduation while she navigated complex personal matters. Chloe then resumed attempting to graduate in both 2017 and 2019, which resulted in both the University and OUA advising her that the other party was responsible for the graduation matter. However, neither party followed through to ensure Chloe's degree was conferred through the appropriate graduation process.

On 14 December 2023, Chloe again raised the matter with the University and did not receive an outcome until 26 September 2025. The outcome from the University stated that:

- Chloe's degree couldn't be conferred due to a 10-year time limit

¹ Student's name and degree have been anonymised for privacy.

² To avoid impacting future engagement between Chloe and the higher education provider in the implementation of Recommendation 2, we have removed references to the specific higher education provider.



- Chloe's enrolment had changed to a variant of her original course – contrary to her request to remain in the original version of the course due to her career interests.
- the University would not investigate this disputed enrolment matter as it would not change the outcome in relation to degree conferral, and
- that there were complex administrative and compliance related challenges between OUA and the University around the time of Chloe's enrolment and that these challenges likely contributed to Chloe's incorrect course enrolment.

Chloe responded to the University within 2 business days, seeking a review and advising she intended to escalate the matter. After waiting several weeks for a response, on 5 November 2025, Chloe complained to the NSO.

Investigation

Based on the information provided, the NSO held significant concerns that the University may have denied conferring Chloe's degree despite her completing all the academic requirements and paying for the course in full.

Additionally, it appeared that Chloe's graduation had been delayed for reasons beyond her control, and she may have been unfairly disadvantaged as a result. Chloe reported to the NSO that not having evidence of completing a bachelor's degree limited her career progression as a staff member within the higher education sector.

Accordingly, the NSO commenced an investigation and sent a notice to the University on 22 December 2025, outlining a summary of what had occurred from Chloe's perspective, what Chloe was seeking, our preliminary concerns, and a request for information. The NSO also gave an opportunity for the University to outline any action it intended to take should it identify wrongdoing.

Response

The NSO received the University's response on 19 January 2026. The response was candid, reflective and demonstrated commendable accountability for the erroneous advice and poor student experience of Chloe. The University did not dispute the



summary of what occurred from Chloe's perspective and agreed to the remedial action proposed by Chloe.

Remedial action

In the 19 January 2026 response, the University outlined immediate steps it had taken to remediate per Chloe's request, including:

- arranging conferral of Chloe's original degree
- preparing a letter to support Chloe's academic record that outlines the reasons for the delay of her degree conferral.

The University additionally offered Chloe:

- financial assistance with interstate travel arrangements should she wish to attend graduation in person
- a phone call from the Deputy Director of Student Administration to acknowledge her experience and apologise on behalf of the University.

After the NSO consulted with Chloe, the NSO informed the University that Chloe's preference was to not attend graduation and to receive a written apology from the University. In response, the University arranged graduation in absentia and sent the apology letter directly to Chloe.

The NSO continued to engage with Chloe after receiving the documents from the University. While Chloe was relieved to finally receive conferral of her degree and acknowledgement of her experience, she expressed dissatisfaction with the letter provided to accompany her degree certificate and academic transcript. Chloe stated that she did not feel comfortable providing the letter to potential employers, as it does not clearly state the reasons for the significant delay between her studies and ultimate conferral, or that it was due to circumstances beyond her control.

Reflection and commitments

The University self-identified the key issues that led to Chloe's complaint and outlined in its response that it had addressed or is addressing these issues in one or more of the following ways:



- passively addressed through the passage of time and associated changes with processes and systems between the University and OUA
- actively addressed through the restructure of the enrolment leadership team and implementation of quality assurance assessments, including the establishment of service level expectations and appropriate escalation processes for complex matters
- under review by Deputy Director Student Administration, including how historical complaints can be addressed more appropriately in future.

The NSO provided the University and OUA with a draft copy of this report and the opportunity to make submissions in response. The University made a submission (at the Appendix) to acknowledge the degree conferral difficulties experienced by Chloe and has accepted all recommendations and findings. OUA did not make a submission.

The NSO commends the accountability the University has demonstrated by accepting and already taking steps to implement the recommendations.



Findings and recommendations

Although the University acknowledged the wrong Chloe suffered, the NSO must state that Chloe's experience was unacceptable and summarise what we found in this investigation into Chloe's enrolment at the University through OUA.

Finding 1: Chloe's graduation was unjustly delayed for over 10 years due to significant maladministration by the University

Chloe's experience when applying for graduation over a decade was entirely unreasonable, and the University should have taken it more seriously when Chloe raised it directly in her December 2023 request. Third-party arrangements for the delivery of any aspects of the student lifecycle, including administration, should not negatively affect the student experience. Regardless of any arrangements with third parties, as outlined in Standard 5.4 of the *Higher Education Standards Framework (Threshold Standards) 2021 (Cth)* (Threshold Standards 2021), the third party must meet all standards, and the higher education provider is responsible for quality assurance.

A student's experience should be seamless irrespective of which entity is delivering the service and there should be no disparity between students who are enrolled directly at the University and those enrolled through OUA. It appears that Chloe fell through the gap between the University and OUA when applying to graduate. We found that Chloe would not have experienced such difficulties with graduation should she have not enrolled through OUA, which is wrong and unjust.

Although the University informed the NSO in its response that the graduation process for OUA students was automated in 2014, we are concerned that prior to 2014, the University's graduation process for OUA students may not have been compliant with the following standards within the Threshold Standards 2011 in force at the time:



- Standard 2.1 'Certification documentation issued is accurate and protects against fraudulent use',
- Standard 6.3 'Responsibilities to students'
- Standard 7.3 'Physical and electronic resources and infrastructure'.

The University's handling of Chloe's graduation attempts in 2017 and 2019 also raises concerns with its compliance with the Standard 1.5 'Qualifications and Certification' and Standard 2.4 'Student Grievances and Complaints' of the Threshold Standards 2015 in force at that time. While we acknowledge the passage of time has resulted in limited accessible records, the available evidence shows there was maladministration with the University's graduation process for OUA students over several years.



Finding 2: Chloe's student record was not accurate due to the University's maladministration

Chloe stated in her complaint to the NSO that she was erroneously transferred to a variation of her original course due to teach-out arrangements, despite declining the offer to transfer on 5 May 2012.

In the University's 19 January 2026 response, it stated:

No transfer request could be found in the system. The team was able to verify this as nothing was listed in the OUA file Archive for transfer/admission in 2012. This appears to be a gap in communication/information sharing between OUA and [the University] in 2010–2012.

Email correspondence between OUA and the University in October 2025 shows that OUA contacted the University to request that Chloe's enrolment be changed back to the original variant of the degree. We found that Chloe remained in the incorrect variant of her degree without her agreement, due to the University not actioning the request from OUA.



Finding 3: The University's response to Chloe's attempt to finalise conferral of her degree in 2023 was insufficient, wrong, and took an unreasonable length of time (18 months)

On 14 December 2023, Chloe requested a completion letter from the University. At the time, the University had obligations under the Threshold Standards 2021 to ensure that she received accurate, timely and student-centred services. Although the University's initial response to Chloe's request between December 2023 and January 2024 was timely, as the complexity of the request emerged the University's response to Chloe's request was significantly delayed contrary to Standard 2.4 'Student Grievance and Complaints' of the Threshold Standards 2021.

Standard 2.4.2 requires providers to have policies and processes that deliver timely resolution of complaints. Although we acknowledge that Chloe did not submit a formal complaint to the University, she had raised it with front-line administrative staff. These staff then did not advise Chloe or give her information about the University's complaint process, which in our view further prevented her ability to resolve her grievance, as required by Standard 2.4.1 of the Threshold Standards 2021.

The University's response to Chloe's request between January 2025 and September 2025 was grossly inadequate. To highlight just one example, Chloe had to send 5 follow up emails between March and September 2025 to prompt a response from the University staff.

The unreasonable delays and failure to provide correct advice alone constitute administrative negligence, but the unprofessional remarks and attempts to shift blame to Chloe in the final response from the Enrolment Specialist Coordinator on 26 September 2025 were particularly egregious. To quote:

...This leaves us in a rather unique situation, noting that if you had requested graduation in the years immediately following completion of your units it may have been possible to make



some adjustments to your course enrolment to enable you to graduate...

...These circumstances are very unfortunate, noting that it is not a good option for students to leave their application to graduate too long due to course versions expiring accreditation wise, in the dynamic University environment particularly over 10 years or more. Please note also there is no point in this particular case in investigating why you completed the wrong units as it will not change the outcome. I am guessing that it may be related to differing advice from OUA, who administered the course, verses [the University] who award the course and have to comply with the course award rules. It is this complexity that has been a factor in the University no longer having a link with OUA...

Despite receiving a respectful response from Chloe on 29 September 2025 that clearly outlined her circumstances, a number of prior graduation attempts from 2012 onwards, and intention to escalate the matter, University staff closed the email enquiry on 2 October 2025 without acknowledging Chloe nor providing further advice or options.

The University's own reflection and summary of these failings to the NSO in January 2026 are pertinent here:

While the historical nature of Chloe's case and the difficulty in obtaining legacy information is challenging, particularly as this involves a third party, this should not impact our method or ability in providing professional, efficient and a customer-centred service experience. In this instance, what has occurred is a failure of effective enquiry management and a lack of procedural rigour in ensuring this matter was addressed and resolved within a reasonable timeframe.

Although we commend the University for its responsiveness to our investigation, the lack of responsiveness to Chloe's original written request has highlighted disparity between the University's willingness to respond to the NSO and to the student. It should not take intervention from the NSO to yield a responsive and fair outcome.



As the University's letter to the NSO acknowledged, greater curiosity and rigour in engaging with Chloe's complaints – and with her earlier requests to graduate – would have seen this issue identified much earlier and dealt with appropriately by University staff.



Recommendations

The University has already taken some appropriate steps to remediate Chloe's experience following receipt of our investigation notice.

Additionally, we are satisfied with the University's reflection and accountability, as well as the commitments made to improve its practices. We welcome the University's remedial action, and responsiveness to our investigation.

However, given the seriousness of what went wrong in Chloe's case and the consequential impact of this on Chloe, we make the following recommendations.



Recommendation 1

We recommend [the University] send Chloe a revised version of the completion letter of 23 January 2026 that explicitly and unreservedly accepts responsibility for the delay in her graduation, to accompany Chloe's degree certificate and academic transcript.

Recommendation accepted



Recommendation 2

We recommend [the University] invite Chloe to apply for financial compensation and process this in a fair and timely manner.

The compensation should consider the difference in potential earnings between the date of Chloe's completion letter request to [the University] on 14 December 2023 to the date she received her degree certificate (testamur) in 2026.

Recommendation accepted





Recommendation 3

We recommend [the University] provide an update to the NSO on what it has done in relation to this complaint in [6 months from the report], with a progress report on [the University]'s stated commitments from the letter dated 19 January 2026, including;

Commitment 1

Effective management of historical complaints

Our [a senior staff position] will be looking into this in more detail. As this is such a rare occurrence the [senior staff's] assumption [is] that there is a lack of clarity on how we can effectively manage historical completions such as this.

Commitment 2:

Review of service levels and quality assurance

What has occurred since the (sic) 1 December 2025, is a restructuring of the leadership of this team, with overall accountability now sitting with [a senior staff position]. A full review of service levels across all teams is occurring as is a roll out of quality assurance assessments to ensure all future student interactions meet service level expectations. Further to this, [there] will be a clear escalation process for staff on matters of complexity, such as this.

Commitment 3

Improved approach to monitoring enquiry resolution and service levels

For a number of reasons the enquiry was poorly managed and organisational change has occurred to ensure appropriate management structure is in place to oversee the [enrolment team] and a more thorough approach to monitoring enquiry resolution and service levels has been implemented, which is consistent with other [University] teams.

Recommendation accepted





Recommendation 4

We recommend that if [the University] has not already do so, [the University] report the student services related issues referred to in 'Commitment 2' and 'Commitment 3' as a Material Change Notification to TEQSA under Section 29 of the *Tertiary Education Quality and Standards Agency Act 2011* (TEQSA Act).

Recommendation accepted



Appendix – The University's response³

Dear Mr Anderson.

Re: Proposed investigation report to the University – NSO

Thank you for your letter of 7 July 2026, inviting our response to the draft report of the investigation of matter referred to you by Chloe.

Please find below the University's response to the findings and recommendations in the proposed investigation report.

Recommendation 1

The NSO recommends the University send Chloe a revised version of the completion letter of 23 January 2026 that explicitly and unreservedly accepts responsibility for the delay in her graduation, to accompany Chloe's degree certificate and academic transcript.

The University accepts Recommendation 1

The University has amended the student's completion letter which now includes the following paragraph "As a consequence of administrative procedures that were not clearly articulated at the time, Chloe's award was subsequently conferred in 2026 as part of a historic conferral process. The University accepts responsibility for the delay in her graduation."

Recommendation 2

The NSO recommends the University invite Chloe to apply for financial compensation and process this in a fair and timely manner.

³As with the report, we have replaced the student's name with a pseudonym and removed specific references to the higher education provider.



The compensation should consider the difference in potential earnings between the date of Chloe's completion letter request to the University on 14 December 2023 to the date she received her degree certificate (testamur) in 2026.

The University accepts Recommendation 2

The University agrees to invite Chloe to contact the University in this context. The University will use its best endeavors to ensure a fair and reasonable sum is agreed, taking into account the facts of this matter including legitimate costs incurred.

Recommendation 3

The NSO recommends that the University provide an update to the NSO six months from the date of this letter, including a progress report on the commitments outlined in the University's letter dated 19 January 2026:

The University respectfully accepts Recommendation 3 and will provide the NSO with an update on or about 7 January 2027.

The University's update to the NSO on or about 7 January 2027 will include consideration of the ongoing efficacy of the below Commitments.

Commitment 1:

Effective management of historical complaints

Our [a senior staff position] will be looking into this in more detail. As this is such a rare occurrence the [senior staff's] assumption [is] that there is a lack of clarity on how we can effectively manage historical completions such as this.

Commitment 2:

Review of service levels and quality assurance

What has occurred since the (sic) 1 December 2025, is a restructuring of the leadership of this team, with overall accountability now sitting with [a senior staff position]. A full review of service levels across all teams is occurring as is a roll out of quality assurance assessments to ensure all future student interactions meet service level expectations. Further to this, [there] will be a clear escalation process for staff on matters of complexity, such as this.



Commitment 3:

Improved approach to monitoring enquiry resolution and service levels

For a number of reasons the enquiry was poorly managed and organisational change has occurred to ensure appropriate management structure is in place to oversee the [enrolment team] and a more thorough approach to monitoring enquiry resolution and service levels has been implemented, which is consistent with other [University] teams.

Recommendation 4

We recommend that if the University has not already do so, the University report the student services related issues referred to in 'Commitment 2' and 'Commitment 3' as a Material Change Notification to TEQSA under Section 29 of the Tertiary Education Quality and Standards Agency Act 2011 (TEQSA Act).

The University respectfully accepts Recommendation 4

The University confirms that a report of the student services related issues referred to in Commitment 2 and Commitment 3 (above) was submitted to TEQSA as a Material Change Notification under section 29 of the *Tertiary Education Quality and Standards Agency Act 2011* (TEQSA Act) on 23 July 2026.

Conclusion

The University thanks the NSO for its consideration of this matter and for the opportunity to respond to the proposed investigation report.

The University acknowledges that conferral processes weren't entirely transparent leading to difficulties for Chloe's degree being awarded. To this extent, the University will continue to monitor any future student complaints that are similar in nature to avoid such circumstances and to enhance the student experience.

Please let me know if you require any further information regarding The University's response.

Yours sincerely,

[University staff member]



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Level 5, 7 London Cct

Canberra ACT 2601

Tel: 1300 362 072

Email: ombudsman@ombudsman.gov.au