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Sam Greentree

Abstract

Professional accreditation standards are increasingly formalising digital practice competencies as graduate requirements. In parallel, institutional governance of generative artificial intelligence (GenAI) remains pre-dominantly oriented towards risk management. This study examines the alignment between university policy and evolving professional standards across 35 Australian higher education providers offering Exercise and Sports Science Australia (ESSA) accredited courses.

Through a systematic document analysis of publicly available policies and guidance materials, the research identifies two primary governance models: embedded integrity governance, which integrates GenAI into existing misconduct frameworks, and standalone GenAI policies providing detailed operational guidance.

Results show that while all institutions permit conditional GenAI use, the prevailing policy discourse is framed through risk management, disclosure, and misconduct prevention. Across the sample, only two (6%) of the 35 institutions included any language connecting GenAI to professional practice or graduate capability, and none of these connections were discipline specific to exercise science or exercise physiology. This pattern suggests that during the regulatory transition, universities are prioritising assessment security over the integration of GenAI as a core professional competency. These results provide a critical baseline for institutions as they prepare for the implementation of revised ESSA Exercise Physiology accreditation standards in January 2027. Future research directions include course-level investigation of how GenAI competencies are integrated into curriculum design, graduate outcomes, and cross-disciplinary accreditation governance.

Keywords

Generative artificial intelligence; higher education; governance; academic integrity; professional accreditation; digital practice

Pathways to collaboration

- Prior to this study, no population-level baseline existed for how Australian higher education providers delivering ESSA-accredited courses govern generative artificial

intelligence. This study provides that baseline from a complete census of 35 providers at a defined point in time (March to April 2026).

- This study identifies a significant gap between risk management orientation of current institutional GenAI governance and the professional digital capability expectations embedded in the forthcoming 2027 ESSA exercise physiology accreditation standards, providing a reference point for institutions considering whether and how their governance frameworks address this emerging requirement.
- A five-category inductively derived coding framework for GenAI governance analysis is developed and applied, with potential applicability to other professionally accredited disciplines beyond exercise science.
- Both institutions referencing professional capability held standalone artificial intelligence policies, suggesting the governance model may be a relevant variable for future investigation.
- The study identifies an agenda for future research, including course-level investigation, cross-disciplinary accreditation comparison, and post-2027 policy reassessment.

Introduction

The rapid emergence of generative artificial intelligence (GenAI) technologies has considerably disrupted teaching, learning, and assessment practices in higher education. Tools capable of generating images, writing code or producing structured text such as essays or scientific reports have prompted widespread institutional concern regarding academic integrity, assessment design, and the authenticity of student work (Cotton et al., 2023; Kasneci et al., 2023). Beyond these immediate concerns, academics have increasingly argued that universities require coherent artificial intelligence education policies to guide how students learn about, with, and alongside artificial intelligence (AI) technologies (Adamakis & Rachiotis, 2025). Such policies are seen as necessary to ensure graduates understand the capabilities, limitations, and ethical consequences of AI systems that are rapidly being integrated across professional sectors (Chan, 2023).

In Australia, the Tertiary Education Quality and Standards Agency (TEQSA) is the national regulator for higher education and sets the threshold standards to which all registered providers must comply. TEQSA's regulatory guidance has encouraged universities to reconsider assessment design and governance frameworks in response to the emergence of GenAI technologies (Lodge et al., 2023). This guidance makes clear that assessment redesign is not only about academic integrity but also about structuring tasks at subject and course levels to develop coherent skills that prepare students for post-study careers (Lodge et al., 2025). Compliance with TEQSA standards is therefore the primary governance obligation for all Australian universities, establishing the baseline within which discipline specific accreditation requirements operate.

For courses that lead to professional registration or recognition, an additional governance layer is imposed by professional accrediting bodies. These bodies define the competency standards that graduates must meet to attain professional recognition, and universities delivering accredited courses must demonstrate that their courses satisfy these standards. In the Australian exercise and sport science sector, ESSA performs this role, defining the competencies required for graduates to attain professional recognition as Accredited Exercise Scientists (AES) and Accredited Exercise Physiologists (AEP).

At the same time, professional sectors are increasingly formalising digital practice as a core component of professional conduct. In the Australian exercise and sports science sector, this shift is traceable across a clear documentary progression. The 2021 AEP professional standards named digital practice as a graduate requirement but contained no reference to artificial intelligence in either the standards document or accompanying support guide (ESSA, 2021a; ESSA 2021b). The introduction of the ESSA Digital Practice Standards in 2024 marked a substantive development, establishing expectations for the safe, ethical and effective use of digital technologies across all ESSA-accredited practitioners and explicitly acknowledged AI as an emerging component of professional digital practice within the accompanying support guide (ESSA, 2024c; ESSA, 2024d). The 2024 AES professional standards, released in the same year, reflect this shift. While the standards document itself does not reference AI explicitly, the accompanying support guide defines AI within its Digital Practice section, identifying predictive modelling, and personalised coaching as broad applications of AI within exercise science. This section also noted the need for AES professionals to maintain currency with AI advancements and to be aware of the ethical considerations for use (ESSA, 2024a; ESSA, 2024b). The progression culminates in the revised AEP professional standards taking effect in 2027, which formally embed compliance with the Digital Practice Standards as a graduate accreditation condition and whose accompanying user guide provides element-linked illustrative examples of GenAI competency (ESSA, 2025a; ESSA, 2025b). Taken together these documents trace a regulatory trajectory from digital practice as a named by undefined requirement, through AI awareness, to AI as an illustrated graduate competency. This trajectory forms the governance context for this study.

The convergence of TEQSA's assessment reform agenda and ESSA's evolving professional standards creates a specific governance challenge for universities delivering ESSA-accredited courses. While TEQSA encourages all institutions to engage with GenAI in assessment reform, ESSA's standards will additionally require that graduates of accredited exercise physiology courses demonstrate digital practice capability in professional contexts from 2027 onwards. Whether current institutional GenAI governance frameworks are oriented to meet this dual requirement has not been examined in the context of professionally accredited courses.

Digital practice standards and GenAI within professional practice

The 2024 ESSA Digital Practice standards formalised digital practice as a core professional requirement across all ESSA-accredited practitioners. This represented a shift from digital technology as an adjunct skill to a defined component of safe and ethical professional conduct (ESSA, 2024c). The standards do not address AI explicitly. Rather, they establish a broad framework requiring practitioners to select digital technologies that comply with Australian privacy laws, use best-practice encryption, manage data appropriately and maintain health and medical sector privacy standards (ESSA, 2024c). This framework is intended to be read in conjunction with the accompanying Digital Practice Standards support guide and with ESSA's professional standards for accreditation. The support guide extends this framework by dedicating a specific section to artificial intelligence. This section noted that ESSA professionals may consider integrating GenAI into digital practice where they understand the associated risks, benefits, limitations and ethical considerations for GenAI use (ESSA, 2024d). The support guide identifies illustrative applications including AI-assisted analysis of movement patterns in exercise videos; machine learning tools for exercise program customisation and injury risk assessment; and automation of administrative tasks such as data entry or appointment scheduling (ESSA, 2024d). Key considerations governing any such GenAI use include data privacy and security, transparency and informed consent, ethical use and bias management, tool accuracy and reliability, client safety, licensing compliance and practitioner competency in using these tools (ESSA, 2024d). These documents collectively establish that GenAI use is not mandated, but that ESSA-accredited professionals are expected to approach GenAI integration critically, ethically and within an established professional governance framework.

AEP professional standards and the 2027 accreditation requirement

The 2025 AEP Professional Standards similarly make no explicit reference to AI. Instead, they formally embed compliance with the Digital Practice Standards as a graduate accreditation requirement through Professional Attribute 12, which requires graduates to apply responsible and appropriate practices in accordance with the Digital Practice Standards. Element 1.2.3 requires the integration of these standards into digital service delivery inclusive of risk management, informed consent and data protection (ESSA, 2025a).

The accompanying AEP user guide provides illustrative examples of how these elements might be developed in graduates including GenAI specific scenarios.

- For Element 1.2.2, the user guide suggests graduates might develop and critically review structured reports, including those generated by GenAI, that summarise a client's situation, assessment and treatment plans.
- For Element 1.2.3, example knowledge includes understanding the medicolegal considerations of AI-assisted note-taking and report writing as well as understanding the learned biases that AI tools carry. The corresponding example skill involves

applying digital risk management frameworks when integrating AI-driven tools such as virtual assistants and clinical decision support systems.

- For Element 1.2.4, example skills involve verbally narrating all aspects of a client consultation to ensure effective and appropriate use of AI based note-taking tools (ESSA, 2025b).

It is important to note that these are examples of what knowledge and skills graduates could encompass within each element. They are not prescribed competency mandates, however their inclusion in the official user guide signals that GenAI capability is considered a relevant and emerging component of professional digital practice preparation. This stands in marked contrast to the 2021 AEP support guide, which contained no mention of AI as an example knowledge or skill for any Element (ESSA, 2021b), and to the 2024 AES support guide, which referenced AI at the level of professional awareness without linking to specific graduate competency examples. The 2025 AEP Professional Standards and accompanying support guide (effective January 2027) therefore represent the most advanced point in the regulatory progression traced across this document set.

Study Overview

This study examines how Australian higher education providers delivering ESSA-accredited exercise science and exercise physiology courses currently position generative artificial intelligence within their institutional governance frameworks. Specifically, it addresses the following research question: To what extent do the institutional GenAI governance frameworks of Australian higher education providers delivering ESSA-accredited programs explicitly address professional digital practice capability? This question is particularly pressing given the 2027 implementation of revised AEP accreditation standards, which signal GenAI capability as an emerging component of professional digital practice preparation. The findings provide a population level baseline at a moment when the gap between current governance orientation and forthcoming accreditation requirements is at its widest.

Methods

Research design

This study adopted a document analysis approach, which is appropriate for examining publicly available institutional information that present an organisational position on a specific policy (Bowen, 2009). Document analysis provides a systematic and transparent means to map how institutions formally articulate governance positions, making it well suited to the study's aim of describing GenAI governance across a defined population of providers at a specific point in time. Given that the primary research question focuses on policy content and framing rather than on enacted practices or participant experiences, document analysis was selected as the most appropriate method to achieve the study aims without requiring participant access. Document analysis can be conducted systematically and efficiently and enables a sector-wide

snapshot that more resource-intensive methods such as interviews or surveys cannot feasibly achieve at the same scale and speed (Bowen, 2009).

This approach is not without limitation as publicly available policy documents represent formal institutional positions and do not capture how policies are interpreted or implemented into teaching practice. The findings should therefore be understood as a baseline of stated governance and not a measure of implemented practice.

Ethical considerations

This study did not require formal ethics approval. The research involved a systematic analysis of publicly available institutional policy documents and student-facing guidance materials. No human participants were recruited, no personal data were collected, and no individuals were identified or contacted as part of the research process. All documents analysed were publicly accessible at the time of data collection and are routinely published by institutions as part of their governance obligations. As an independent researcher, the author applied the ethical principles appropriate to document-based research, including transparency of method, accurate representation of source materials, and appropriate attribution of all documents cited.

Sample

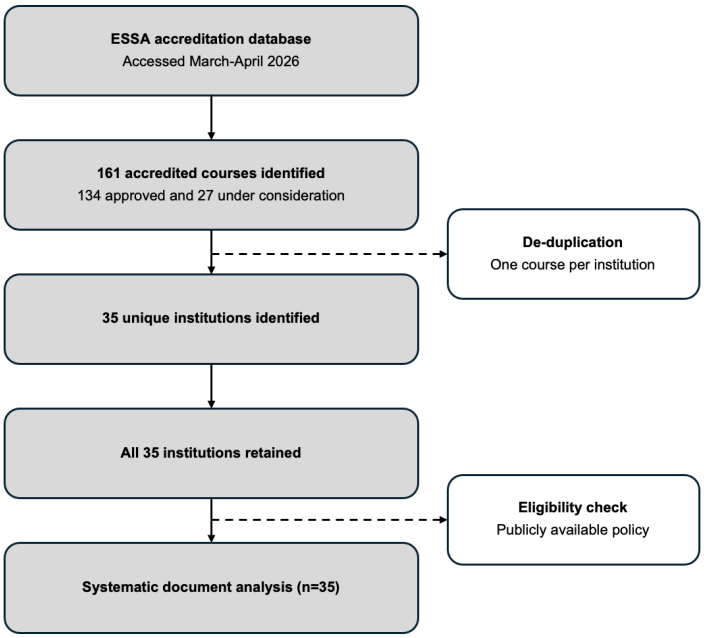
The sample consisted of all 35 Australian higher education providers identified through the ESSA accreditation database as offering at least one accredited course in exercise science (AES pathway) or exercise physiology (AEP pathway) at the time of data collection. This includes institutions with full accreditation, qualifying accreditation, or course under review, as all are required to demonstrate alignment with ESSA's professional standards as a condition of seeking or maintaining that status. Where an institution held accreditation across both pathways, it was counted once, as the unit of analysis was the institution rather than the individual course. This represents the complete population of providers within these two accreditation pathways, ensuring comprehensive coverage of the field.

Data collection

The sampling frame was derived from the ESSA accreditation database, which listed 134 approved courses and 27 courses under consideration at the time of data collection (see Figure 1). Many of these courses were offered by the same institution, and as the unit of analysis was the institution rather than the individual course, duplicate institutions were removed. This process identified 35 unique higher education providers, constituting the complete population of Australian higher education providers delivering ESSA-accredited courses. All 35 institutions were included in the analysis, as each maintained at least one publicly available policy document meeting the eligibility criteria and no institutions were excluded.

Figure 1

Derivation of the analytical sample from the ESSA accreditation database.



Publicly available institutional documentation was systematically identified and retrieved between 4th March to 16th April 2026 (inclusive). For each of the 35 providers, a structured search was conducted of institutional policy libraries, student-facing webpages, and academic support or library resources. Documents were eligible for inclusion if they addressed GenAI or artificial intelligence in the context of academic assessment, academic integrity, or student learning and professional practice. Only formally published policy documents and publicly accessible student-facing guidance resources were included; procedural documents were excluded from the analysis as these were not consistently available across institutions and, where reviewed, did not introduce any significant governance context beyond what was already captured in the primary policy or guidance documents.

For each institution, documents were identified through a structured three-step sequence:

1. a search of the institution's central policy library or equivalent governance repository using the terms 'artificial intelligence, 'generative AI', and 'academic integrity';
2. a review of student-facing webpages including library, academic skills, and learning support sites; and
3. a targeted review of any linked or cross-referenced documents identified during the preceding steps.

An institution was considered to have a standalone GenAI policy where a dedicated AI or GenAI policy document existed, distinct from a broader academic integrity policy. Where no standalone document was located, the academic integrity policy was reviewed for embedded GenAI provisions.

The document types included in the analysis were:

- Institutional artificial intelligence or GenAI-specific policies
- Academic integrity policies containing GenAI provisions
- Institutional guidance documents addressing GenAI use in learning and assessment
- Library or student support pages providing guidance on GenAI tools

Table 1 provides a summary of institutional sample and the types of documents sourced.

Table 1

Institutional sample and policy sources

Category*	Number of institutions
Total institutions analysed	35
Institutions with standalone GenAI policy	13
Institutions with GenAI embedded in academic integrity policy	22
Institutions with GenAI guidance pages (e.g., library/academic support)	35
Institutions referencing specific GenAI tools (e.g., ChatGPT, Copilot)	8
Institutions with explicit reference to professional capability or graduate readiness	2

**Note.* Categories are not mutually exclusive. Some institutions maintained both academic integrity policy containing embedded GenAI provisions and a separate standalone GenAI policy. In such cases, both documents were reviewed and the more operationally detailed document (the standalone policy) was coded as the primary source.

Analytical process

A structured coding framework was developed prior to data collection to enable consistent cross-institutional comparison. This framework was informed by existing literature on GenAI governance in higher education (Lodge, et al., 2023) and by the competency domains outlined in the ESSA Digital Practice Standards (ESSA, 2024c). The coding framework consisted of the following categories:

1. *Policy structure:* whether GenAI governance was embedded within academic integrity policy or addressed through a standalone policy
2. *Conditions of GenAI use within assessments:* whether and how conditional use was specified at the institutional level, as distinct from conditions delegated to subject coordinators. Subcategories included:
    - ‘Yes’ where the institution policy advised GenAI use was subject specific or at the discretion of the subject coordinator,
    - ‘Conditional’ where GenAI use was restricted for specified assessment types
    - ‘No’ where the information was not present in the policy

3. *Disclosure requirements:* the nature of requirement to declare GenAI use in assessed work
4. *References to responsible or ethical use:* the language used to characterise appropriate GenAI conduct
5. *References to professional capability or digital practice:* any explicit connection between GenAI and professional readiness or industry competencies

Coding was conducted solely by the author. The five coding categories were developed inductively from an initial review of the institutional documents, with the emergent categories subsequently confirmed against existing literature. Category *1. Policy structure* reflected the two dominant approaches identified across the document sample and is consistent with patterns discussed in Lodge et al. (2023). Categories *2. Conditions of use*, *3. Disclosure requirements* and *4. Responsible or ethical use guidelines* represented the primary operational focus present across all policies reviewed, and Lodge et al. (2023) similarly identify these as foundational dimensions of institutional GenAI governance in the Australian context. The final category, *5. Professional capability*, directly corresponded to the study's research question and was deliberately framed in general rather than discipline specific terms to preserve the framework's applicability beyond the ESSA context. These five categories were selected over alternatives because they were consistently codable across all 35 institutional documents and collectively captured the dimensions most relevant to the research question.

To support consistency and trustworthiness of the analysis, the coding framework was piloted on an initial subset of institutional documents prior to application across the full sample. The pilot sample comprised the first five institutions reviewed in alphabetical order. During this phase, several refinements to the decision rules were made in response to ambiguities encountered in the documents.

> **Priority Rule 1:** *Where both an academic integrity policy containing embedded GenAI provisions and a separate standalone AI policy existed, the more specific or operationally detailed policy was coded.* In each instance this was the standalone policy which exceeded the level of depth and any reference to academic integrity or misconduct was usually also referred to in a subsection of these policies.
>
> **Priority Rule 2:** *Where the same content appeared in both a formal policy document and a student-facing guidance webpage, the formal policy document was treated as the primary source.* Student-facing pages were used only where they contained substantive governance content absent from the policy document.
>
> **Priority Rule 3:** *The coding criterion for conditions of GenAI use required explicit institutional specification.* Three subcategories were established to accommodate the

variation identified across documents: permitted use, conditional use and prohibited use.

Priority Rule 4: *Disclosure requirements were coded only where explicit institutional language was present.* This was most commonly identified within the embedded academic integrity policies, where undisclosed GenAI use was listed as a form of academic misconduct.

Once these decision rules were established, the framework was applied consistently to all remaining institutions. Data were recorded systematically within a spreadsheet database, with one row per institution and columns corresponding to each coding category. For each institution, relevant text segments from source documents were recorded verbatim alongside the assigned code, creating an auditable trail linking coding decisions to their source material. Where documents were ambiguous or contained implicit rather than explicit references to a coding category, a conservative decision was made to code the element as absent, and the rationale was noted within the database.

The analytical focus was on identifying patterns in how universities positioned GenAI within governance frameworks and the extent to which institutional policies articulated GenAI use as a part of a broader professional digital capability. Descriptive analysis of coded frequencies was used to characterise the distribution of governance approaches across the sample.

Findings

Analysis of institutional documentation revealed that all 35 higher education providers had implemented some form of governance addressing generative artificial intelligence. The depth and framing of these documents varied substantially. Two broad governance approaches emerged from the analysis: embedded integrity governance, observed across 22 of 35 institutions (63%) and standalone GenAI governance, observed across the remaining 13 (37%). Table 2 presents the full coding results across all institutions. Institutions are grouped by policy type (Embedded integrity governance followed by Standalone GenAI governance) to facilitate comparison across governance models.

Table 2

Coding results: GenAI governance characteristics across all 35 ESSA-accredited providers

Institution	Policy Type	GenAI Permitted in Assessment	Disclosure Required	Responsible / Ethical Use Guidance	Reference to Professional Capability
Embedded Integrity Governance (n = 22) — GenAI governed within academic integrity frameworks					
University A	Embedded	✓	✓	✓	–
University B	Embedded	✓	✓	✓	–
University D	Embedded	✓	✓	✓	–
University F	Embedded	✓	✓	✓	–
University G	Embedded	✓	✓	✓	–
University H	Embedded	✓	✓	✓	–
University J	Embedded	✓	✓	✓	–
University K	Embedded	✓	✓	✓	–
University O	Embedded	✓	✓	✓	–
University P	Embedded	✓	✓	✓	–
University Q	Embedded	✓	✓	✓	–
University S	Embedded	✓	✓	✓	–
University U	Embedded	✓	✓	✓	–
University V	Embedded	✓	✓	✓	–
University W	Embedded	✓	✓	✓	–
University X	Embedded	✓	✓	✓	–
University Y	Embedded	✓	✓	✓	–
University Z	Embedded	✓	✓	✓	–
University EE	Embedded	✓	✓	✓	–
University FF	Embedded	✓	✓	✓	–
University GG	Embedded	✓	✓	✓	–
University II	Embedded	✓	✓	✓	–
Subtotal — Embedded integrity governance (n=22)		22/22 unconditional	22/22	22/22	0/22
Standalone GenAI Governance (n = 13) — Dedicated institutional AI policy					
University C	Standalone	✓	✓	✓	–
University E	Standalone	✓	✓	✓	–
University I	Standalone	✓	✓	✓	–
University L	Standalone	✓	✓	✓	–

University M	Standalone	✓	✓	✓	–
University N	Standalone	C	✓	✓	–
University R	Standalone	✓	✓	✓	–
University T	Standalone	✓	✓	✓	–
University AA	Standalone	C	✓	✓	–
University BB	Standalone	✓	✓	✓	–
University CC	Standalone	✓	✓	✓	✓
University DD	Standalone	✓	✓	✓	–
University HH	Standalone	✓	✓	✓	✓
Subtotal — Standalone GenAI governance (n=13)		10/13 unconditional	13/13	13/13	2/13
GRAND TOTAL (n = 35)		33/35 unconditional	35/35	35/35	2/35

Note. ✓ = Yes; – = No; C = Conditional (GenAI use was clearly specified for assessment types)

Embedded integrity governance

The most prevalent governance approach, observed across 22 of the 35 institutions (63%), involved the integration of GenAI provisions within existing academic integrity frameworks. In these institutions, GenAI was positioned primarily as a potential source of academic misconduct, with policy language focused on conditions of permitted use, disclosure requirements, and consequences for unauthorised use.

These frameworks typically addressed generative tools as a form of unauthorised assistance, focusing on the conditions under which their use might be permitted and the penalties for failing to disclose such assistance. For example, Universities P, K and X frame the use of GenAI without acknowledgement as a form of plagiarism constituting academic misconduct. University X also noted that a student's failure to adequately reference GenAI use in an assessment task may be considered student misconduct under the institutions' Student Code of Conduct. This approach is illustrative of a broader pattern across embedded governance institutions, where GenAI is governed through an extension of existing plagiarism and misconduct categories rather than through purpose-built guidance. By integrating GenAI into existing misconduct frameworks, these institutions prioritise the prevention of academic fraud over exploration of educational utility, framing these technologies as a potential source of policy violations rather than as emerging capabilities relevant to professional practice.

Standalone GenAI governance

Thirteen of the 35 institutions (37%) had developed standalone institutional policies specifically addressing artificial intelligence. These policies typically provided substantially more detailed guidance and adopted a broader governance perspective, acknowledging GenAI as an

emerging technology impacting learning, teaching, research and in some cases professional practice. Of the 13 standalone policies:

- 13 included definitions of generative artificial intelligence and related technologies;
- 13 provided examples of appropriate and inappropriate uses in academic contexts;
- 10 offered differentiated guidance for both students and staff; and
- 13 included explicit discussion of responsible and ethical GenAI use.
- 2 included language connecting GenAI to professional practice or graduate capability.

Explicit examples of assessment types where GenAI use was prohibited were rare. Only two institutions (University N and University AA) clearly stated that GenAI use would not be permitted in person examinations.

Despite these differences in framing and scope, several features were consistent across all 35 institutions. The substantive differences between governance models lie in the additional contextualisation provided by standalone policies, particularly the framing of GenAI as an emerging capability rather than purely a compliance risk.

Shared institutional features

Despite structural differences between governance models, several features were consistent across all 35 institutions. All providers permitted conditional use of GenAI within assessments, with conditions typically determined by subject coordinators, assessment design or instructions, or subject outlines. No institution specified an unconditional prohibition on GenAI use across all assessments. All institutions emphasised responsible and ethical GenAI use and required disclosure of GenAI assistance when used in assessed work. Failure to disclose GenAI use was consistently framed as a potential academic integrity breach across both governance models. All 35 institutions also maintained student-facing guidance resources (e.g. library pages or academic support materials) supplementing their formal policy position. References to specific GenAI tools by name (e.g. ChatGPT, Microsoft Copilot) were present in eight institutions' documentation, though typically as illustrative examples rather than as an approved or prohibited tool list.

Professional digital practice framing

Across both governance models, explicit references to GenAI as a professional digital capability within exercise science or exercise physiology were absent. However, two of the 35 institutions (6%) included language connecting GenAI governance to professional practice or graduate capability more broadly. Both institutions hold standalone GenAI policies.

The nature and source of this language varied across the two institutions. University HH's standalone policy explicitly named industry partners and accrediting bodies as stakeholders in

the university's approach to AI integration, the only institution in the sample to reference accrediting bodies directly in its GenAI governance. University CC's standalone policy included student centred principles for GenAI in teaching and learning that acknowledged the significance of GenAI for students' careers and future studies, though this language was situated in an academic integrity framework rather than a professional capability one.

Several institutions addressed GenAI in the context of academic staff professional practice. For example, its use in marking, curriculum design, and resource development, but this staff-facing governance was distinct from any commitment to developing student professional capability.

Discussion

The findings of this study reveal a clear pattern in how Australian higher education providers delivering ESSA-accredited courses are currently governing generative artificial intelligence. Institutional frameworks are currently orientated towards risk management and academic integrity, with limited explicit attention to GenAI as a professional digital competency. This section interprets these findings in relation to existing literature and considers their implications for the exercise science sector during the current period of regulatory transition.

Risk management as the dominant governance framework

The prevalence of embedded integrity governance across the sample (22 out of 35 institutions) reflects patterns identified in the broader higher education literature. Cotton et al. (2023) documented that early institutional responses to GenAI were characterised by reactive, risk focused policy development, often framing these tools primarily as threats to academic integrity rather than opportunities for pedagogical development. The findings of the present study suggest that this risk-management orientation has persisted across the majority of ESSA-accredited providers, even as professional standards have begun to articulate digital capability as a core graduate outcome.

This framing is understandable within the context of regulatory pressure and institutional liability. However, as Lodge et al. (2023) argue in guidance developed for TEQSA, universities may need to consider how to move past detection-based strategies and instead prioritise fundamental assessment reform that fosters evaluative judgement, enabling students to critically monitor their own work and the outputs of digital tools. The findings suggest that this transition is not yet reflected in the governance frameworks of most providers in this sample. Importantly, this pattern is likely not unique to ESSA-accredited providers, given that TEQSA's guidance applies to all Australian universities. The risk-management orientation observed here may be characteristic of the Australian higher education sector more broadly, rather than a feature of institutions offering exercise science or exercise physiology courses.

The gap between governance and professional standards

A central concern emerging from the findings is the apparent misalignment between the current governance orientation of institutions and the expectations embedded in the forthcoming ESSA exercise physiology accreditation standards. The revised standards, taking effect in January 2027, formally embed the Digital Practice Standards as a graduate requirement (ESSA, 2025a) with the accompanying user guide providing illustrative GenAI competency examples including AI-assisted report generation, AI note-taking tools and digital risk management frameworks for AI-driven clinical tools (ESSA, 2025b). Yet the institutional policies reviewed in this study rarely discuss GenAI governance in terms of professional digital practice or clinical capability. Where such language does appear, it is generic rather than discipline specific.

This gap raises substantive questions for the sector: whether the expectation of professional digital capability will be enforced as an accreditation condition, or whether it will remain as an aspirational goal that ESSA and individual institutions address through continuing professional development and curriculum review outside of the formal accreditation cycle. If it is the former, then universities delivering accredited courses have limited time before the 2027 implementation date to ensure their governance frameworks signal and support this capability. If the latter, the governance gap identified here may not constitute a compliance risk but still represents a missed opportunity to use institutional GenAI governance as a mechanism for professional capability development.

Bearman and Ajjawi (2023) argue that students must learn to work effectively within the ambiguous processes of artificial intelligence. They suggest that instead of merely policing the final product, pedagogy should help students learn about and work with the technologies they will encounter in professional settings. The current governance landscape, as revealed by this study, appears to fall short of this ambition for most providers. If institutional frameworks continue to position GenAI as a compliance and integrity issue, they may inadvertently constrain the development of the higher-order digital skills that revised professional accreditation standards will require of graduates.

Implications for policy, practice and research

At the policy level, universities delivering ESSA-accredited courses may need to consider whether existing GenAI governance frameworks are fit for purpose as the 2027 implementation deadline approaches. The development of standalone policies or the revision of embedded integrity frameworks to include explicit statements about GenAI as a professional digital competency may be warranted. The two institutions already referencing professional capability were both located within standalone policies. This may be an indicator of governance model preference should an institution seek to broaden its approach to GenAI policy.

At the practice level, the findings suggest a need for curriculum-level discussions about how GenAI tools are modelled and integrated within exercise physiology and exercise science courses, rather than only addressed through governance constraints. This is consistent with guidance from Lodge et al. (2025) on enacting assessment reform, which emphasises the development of coherent digital skills across course structures rather than through policy alone.

Limitations

This study should be interpreted within the boundaries of a completed scoping study conducted at a single point in time (March-April 2026). As coding was conducted by a single researcher without inter-rater reliability assessment, analytical trustworthiness relied on the structured decision rules, pilot coding process, and verbatim audit trail described in the methods rather than on independent verification. The findings are limited to stated governance content and should not be read as assessments of institutional quality or intent.

For research, this study establishes a pre-implementation baseline with several productive avenues for extension.

First, course-level investigation of how ESSA-accredited courses are enacting digital practice competencies in curriculum design and course delivery would extend this baseline study into the pedagogical domain, which institutional policy alone cannot capture. A subsequent document analysis after the new AEP standards take effect in 2027, would also be valuable, though researchers should note that meaningful institutional policy change typically occurs on longer timescales and may not be detectable within one accreditation cycle.

Second, investigating whether the pattern observed here differs between ESSA-accredited providers and a matched comparison group without professional accreditation obligations would clarify whether the governance approach identified is specific to the accreditation context or reflects a broader sector wide pattern.

Third, examining how GenAI governance aligns with accreditation standards across other health profession disciplines such as occupational therapy, physiotherapy or nursing, would identify whether parallel governance gaps exist in fields where digital practice expectations are similarly evolving.

Fourth, future research should examine not only what institutional policies say but how they are interpreted and enacted by academic staff and students within ESSA-accredited courses.

Conclusion

This completed scoping study examined the institutional governance of generative artificial intelligence across all 35 Australian higher education providers delivering courses accredited by Exercise and Sports Science Australia. Through systematic document analysis, two broad governance approaches were identified: embedded integrity governance, in which GenAI is primarily situated within academic integrity frameworks, and standalone GenAI governance, which provides more detailed operational guidance and, in some cases, a broader orientation towards professional capability.

The contribution of this study is threefold. First, it provides a population-level baseline of how ESSA-accredited providers are governing GenAI at a pivotal moment in the sector's regulatory development. Second, it develops and applies a five-category coding framework for GenAI governance analysis that may be adapted by researchers in other professionally accredited disciplines. Third, and most critically, it identifies a significant gap between the dominant compliance and misconduct-prevention orientation of current institutional governance and the professional digital capability expectations embedded in the revised AEP Professional Standards taking effect in 2027.

The institutional GenAI governance frameworks of Australian higher education providers delivering ESSA-accredited courses address professional digital practice capability to a minimal extent. Two of 35 providers (6%) included language explicitly referencing professional capability within their GenAI governance documents and both held standalone policies. The dominant governance orientation across the sector remains focused on risk management and academic integrity. These frameworks are designed to regulate student conduct rather than promote the development of graduate competencies. As ESSA accreditation standards move towards formalising GenAI capability as a graduate outcome, this orientation is insufficient. Universities delivering ESSA-accredited courses must deliberately reorient their GenAI governance from conduct regulation to professional digital practice capability development.

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