

To: Consultation@teqsa.gov.au

Subject: Response to TEQSA's Interim guidance: Managing external actors

27 March 2025

Dear TEQSA

Universities Australia provides the following feedback on the guidance outlined in TEQSA's *Interim guidance: Managing external actors*.

While the broad guidance provided by TEQSA will provide some support universities in their efforts to respond to the complex issue of external actors in ways best suited to their individual contexts, aspects of the guidance need further consideration to ensure guidance is proportionate and implementable.

For example, the guidance notes that: "A statement should be displayed at entrances to campus for external actors and campus visitors that outlines conditions associated with access to campus." While the intention of this guidance is well meant, the implementation of this guidance will be difficult given the open nature of university campuses.

To make such guidance implementable and effective it is vital that attention is given to finding the right balance between exclusionary and precautionary practices. University campuses are both working and community spaces. It is not the practice in Australia to require people to carry identification with them at all times in community spaces. This practice could disproportionately affect certain groups of students and community members as the introduction of such a mechanism could be viewed as over-policing and racial profiling, having a deleterious impact on student and community experience.

While ensuring that the safety and wellbeing of staff and students is of utmost importance to institutions, care must be taken to ensure that precautionary action does not itself lead to further harm. UA strongly recommends a thorough examination and risk analysis of the proposed guidelines before publication.

TEQSA's collaborative approach in creating this document is welcomed and UA looks forward to these considerations being incorporated into the final Guidance Note.

Yours sincerely,



Luke Sheehy
Chief Executive Officer, Universities Australia