

Dr Mary Russell  
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Dear Dr Russell,

### **Response to TEQSA guidance notes**

Universities Australia welcomes the opportunity to provide feedback on TEQSA's new guidance notes on *Information for prospective and current students*, *Information Management*, and *Representation*.

We recognise the commitment from TEQSA to review and enhance its suite of guidance notes, implementing changes that align these resources with specific standards in the *Higher Education Standards Framework (Threshold Standards) 2021* without imposing additional or expanded obligations on the sector. The guidance notes are concise and use simple language in their interpretation of the Threshold Standards, with examples of issues which are helpful as indicators of regulatory interpretation.

Our members will consider the information provided in these guidance notes within the context of their individual circumstances to ensure continuing good practice. Any additional clarification required will be pursued directly with TEQSA.

That said, the guidance notes are likely to need revision considering the quality and integrity measures that are currently being considered for inclusion in the *National Code of Practice for Providers of Education and Training to Overseas Students 2018* and *Education Services for Overseas Students Act 2000*. As an ESOS agent, TEQSA should provide interpretation of any additional obligations on providers in a timely manner.

We recommend that TEQSA consider inclusion within *Guidance note: Information for prospective and current students* a list of Australian laws that are most pertinent for students, both domestic and international. In context of reference made to *Threshold Standard 2.3: Wellbeing and Safety*, we also recommend that a revised *Guidance Note: Wellbeing and safety* be released to include TEQSA's interpretation of safe environments on campus and online.

As this work continues, we would like to take this opportunity to emphasise the importance of a principles-based and proportionate approach to the interpretation and application of the standards. UA supports the ongoing commitment to increasing quality in the sector without increasing regulatory burden, particularly during this period of reform.

Yours sincerely,



**Luke Sheehy**

Chief Executive Officer, Universities Australia