

22 August 2025

Dr Mary Russell

Chief Executive Officer, Tertiary Education Quality and Standards Agency (TEQSA)

By email: consultation@teqsa.gov.au

Dear Dr Russell

Response to TEQSA guidance notes consultation

Universities Australia (UA) welcomes the opportunity to provide feedback on TEQSA's new guidance notes on *Course approval and accreditation*, *Orientation and progression*, and *Qualifications and certification*.

In considering the new guidance notes, we recommend that TEQSA consider the brevity and tone of new and revised notes to ensure they provide a principles-based interpretation of specific standards. In particular, the *Guidance note: Qualifications and certification* introduces ambiguity in issuance of joint or dual qualification certification documents and language beyond what is found in the Threshold Standards.

UA provided feedback on *Diversity and equity*, *Student grievances and complaints*, and *Wellbeing and safety* guidance notes in March 2024 where we recommended postponement of release until legislative reforms had taken affect. Noting the introduction of the National Student Ombudsman and the anticipated National Higher Education Code to Prevent and Respond to Gender-based Violence, these notes replace significantly outdated guidance and should be prioritised for revision.

We reiterate our previous feedback that the enhanced suite of guidance notes provides a concise interpretation of the Threshold Standards, without imposing or implying additional obligations on the sector. Our members may provide additional feedback relevant to their individual circumstances.

Finally, noting the cadence of recent consultation with the sector on new and revised guidance notes, UA and its members would welcome an indicative schedule of similar consultations, including a timeline for intended publication.

If we can be of further support, please don't hesitate to contact my office by emailing ceo@uniaus.edu.au or calling 02 6285 8100.

Yours sincerely



Luke Sheehy

Chief Executive Officer, Universities Australia