

SUBMISSION TO TEQSA COMPLIANCE GUIDE CONSULTATION

10 November 2021

Universities Australia welcome the opportunity to provide comments on TEQSA's proposed revisions to guidance on Work-Integrated Learning, Scholarship and Admissions (Coursework). Universities Australia represents Australia's 39 comprehensive universities that educate more than 1.4 million students and conduct research on behalf of the nation. Universities Australia welcomes TEQSA's initiative to revise and consult on its guidance material.

Simplification is strongly supported

The new guidance material is significantly simpler than previous guidance notes, which Universities Australia strongly supports. The new format appropriately highlights those areas of the Higher Education Threshold Standards that TEQSA considers carry most risk and provides examples of evidence that providers could use to demonstrate effective policies, practices and procedures that address those risks.

UA is particularly supportive of a move away from guidance that is lengthy and prescriptive, which risked being perceived as a checklist to measure compliance, rather than as an explanation of TEQSA's approach to interpreting the Standards.

'Compliance guide' title should be reconsidered

UA is supportive of TEQSA's intention to revise guidance to make it more accessible for providers. However, UA is concerned that the new title of 'compliance guide' suggests that the guidance notes are a definitive and mandatory resource for complying with the standards. UA respectfully suggests reconsideration of the title to make it clear that the documents are intended to assist providers in understanding TEQSA's approach to the Threshold Standards, rather than as instructions on how to address the Standards with an indirect inference of regulatory status.

UA suggests a generic title such as *TEQSA Guidance*, which could be used as *TEQSA Guidance on Work-Integrated Learning*. This would be a simple description of the nature and purpose of the documents, and not risk confusion with documents with regulatory force.

Guides include a statement at the end: "*TEQSA welcomes the diversity of educational delivery across the sector and acknowledges that its Compliance Guides may not encompass all of the circumstances seen in the sector. TEQSA also recognises that the requirements of the HESF can be met in different ways according to the circumstances of the provider. Provided the requirements of the HESF are met, TEQSA will not prescribe how they are met. If in doubt, please consult your TEQSA case manager.*" This statement might be better moved to the start of each guide to provide better context on the purpose and limitations of the guidance.

Scholarship

UA welcomes the revision of the note on scholarship, and the move to encompass a wide range of scholarship activities. However, UA notes that although the list of 'different forms of scholarship' on page 2 is an improved list, care must continue to be taken not to confuse scholarship with research. UA suggests

that the list should also include 'sharing advances in evidence-based practice' as a scholarly activity, particularly with respect to the scholarship of learning and teaching. Similarly, although membership of professional associations is not included in scholarly activity, professional memberships that encompass ongoing professional development may be a useful framework to demonstrate ongoing engagement with advanced practice.

Admissions

The admissions guide suggests that a provider's admissions framework should ensure that students "are admitted with no known limitations that would impede their progression and completion". UA would encourage revision of this language to ensure that TEQSA's interpretation of the Higher Education Standards remains inclusive of those who may require reasonable adjustments to complete their course, including those made under the *Disability Discrimination Act 1992*.