

The University of Sydney's feedback on TEQSA's draft Guidance Notes on Course Approval and Accreditation, Orientation and Progression, Qualification and Certification, August 2025

The University of Sydney welcomes the opportunity to comment on TEQSA's draft Guidance Notes on [Course Approval and Accreditation](#), [Orientation and Progression](#), and [Qualifications and Certification](#).

The draft Guidance Notes provide clear and comprehensive outlines of TEQSA's regulatory expectations in these areas and usefully draw together the relevant Threshold Standards.

The University endorses broadly the content of the proposed Guidance Notes as appropriate and well expressed. We have very few concerns about the content, as the Guidance Notes serve to reinforce existing best practice across the sector. We do have a few comments for consideration by TEQSA as it finalises these importance resources:

Course Approval and Accreditation

- The expression of expectations in the Guidance Note in relation to accreditation and re-accreditation could benefit from greater delineation between the requirements for these distinct processes, and clarification of where the draft guidance is applicable to both.
 - This could be achieved by stating the delineation in the presentation of guidance on these topics (where applicable) to avoid conflation and risk of confusion in practice. Alternatively, if the guidance is intended to cover both accreditation and re-accreditation, then the heading 'Considerations for developing processes for course approval and accreditation' should be extended to reflect this as 'Considerations for developing processes for course approval, accreditation and re-accreditation'.
 - The University acknowledges that good institutional practice will define the nuance through policy and procedures, but decoupling (where applicable) in the guidance would be beneficial to the intended audience, as would clarifying the language where the scope is intended to cover re-registration as well as registration.
- In the Guidance Note there are multiple references to and uses of the terms 'adequate', 'appropriate', or 'sufficient' pertaining to 'academic scrutiny'. The University acknowledges that these references are derived directly from the Threshold Standards, yet there would be benefit in providing some form of definition or example in the intent of each term to avoid significant variation in interpretation and practice across the sector.

Qualifications and Certification

- Given the subject of the Guidance Note, whilst the University acknowledges guidance is provided on 'joint awards', there appears to be a lack of guidance included for 'dual awards', and 'nested courses of study'.
 - The University notes that including guidance on dual awards and nested courses of study would be helpful for users, as these are known areas of issue across the sector.
 - Inclusion of guidance on providers' obligations with regards to awarding, delineation (where applicable in the award/s issued) and the stage of awarding of the qualifications would serve to support consistent practice across the sector.

The University of Sydney looks forward to continuing to work with TEQSA and other providers in contributing to the collective efforts to clarify and reinforce existing best practice and applications of the Threshold Standards across the sector for our students and community.