

## The University of Sydney's feedback on TEQSA's draft Guidance Notes on Information Management, Information for Prospective and Current Students, and Representation, July 2025

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The University of Sydney welcomes the opportunity to comment on TEQSA's draft Guidance Notes on [Information Management](#), [Information for Prospective and Current Students](#), and [Representation](#).

The draft Guidance Notes provide a clear and comprehensive outline and usefully draw together the relevant Standards and TEQSA's expectations for regulating these across the sector.

The University endorses broadly the contents 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 important resources:

### Information Management

- The expression of expectations in the Guidance Note in relation to the publication of information without a clear definition of the 'repository of publicly-available current information' has led to varied practice across the sector. For students (and providers), there would be benefit from TEQSA providing greater clarity regarding how this information should be housed.
  - An initial recommendation would be to specify that 'providers' websites are considered the most appropriate and broadly accessible digital channel for this information to be housed as the primary mechanism for students to seek detailed information and most often, where to apply for admission. Further, providers should consider and plan for the ease of navigation for students in accessing the relevant information collectively rather than through disparate sources.'
  - Benchmarking and embedding of consistent practice across the sector in the display of this content would serve to improve the ability for students to source the information required and make timely, informed comparisons across providers.
- Reference to the 'duration of the course' in the Guidance Note could be further expanded to include and reinforce the relationship to the volume of learning alongside duration.
- Refer to comments on the Guidance Note on Representation for feedback on the guidance related to the application of 'plain English'.

### Information for Prospective and Current Students

- There would be benefit in providers using a consistent source for determining and providing prospective students with advice on the approximate costs of living and studying in Australia. In the Guidance Note, this could be achieved by TEQSA including a recommendation that providers use – as an example – the Study Australia living and education costs calculator and/or ensure the source for any estimates is reputable and the original source is reflected in the representations to students. The use of a common calculator would ensure greater consistency in the way in which this information is aggregated across the sector, and for students this would ensure limited variation and clear access to the original source material used to determine estimated costs.
- Under the 'A provider must provide reasonable notice of changes' section; examples of the timeframes that would constitute 'reasonable notice' in different circumstances may assist providers and support consistency in practice across the sector to improve outcomes for students.

- Refer to comments below on the Guidance Note on Representation for feedback on the guidance related to the application of 'plain English'.

## Representation

- Given the subject of the Guidance Note, the references to the application of languages other than plain English in communications could be more prescriptive, as 'favour plain English communication' leaves room for error in interpretation and practice and can perpetuate inconsistent sector application.
  - The University notes that in the Guidance Note on Information for Prospective and Current Students the language used is 'adequate information for potential students in plain English before they accept any offers, so students can make informed decisions about whether to enter a course. Providers are also encouraged to provide information in other languages to suit the needs of their cohorts.'
  - Without a definition of 'adequate', but also a reference to providers being 'encouraged' to provide information in other languages to suit the needs of their cohorts, this may unintentionally open the potential for significant variation in practice and seems to be a broadening from the reference to 'favour plain English communication' in the Guidance Note on Representations.
  - As Threshold Standard 7.2.1 – 4: Information for Prospective and Current Students refers to 'written communications to students are in plain English with explanations of any technical or specialised language used to improve the likelihood of understanding.', the flexibility and variation explored in the Guidance Note could benefit from further alignment to avoid significant deviation from the Standard.
- In the Guidance Note, it would be beneficial to draw attention to the Government's microcredential pilot and where FEE-HELP is applicable to avoid any doubt in the provision of advice by providers or interpretation by students regarding the accessibility of FEE-HELP. The introduction of FEE-HELP for the pilot is still relatively new and including this context would help ensure accurate interpretation and representations 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 Standards across the sector for our students and community.