



Summary of external consultation on Guidance Note: Credit and Recognition of Prior Learning, Delivery with Other Parties

In early 2023, TEQSA received feedback from several providers and peak groups, including:

- Griffith University
- Queensland University of Technology
- University of Canberra
- Charles Darwin University
- RMIT University
- Deakin University
- University of Southern Queensland
- Private Individuals



Summary of the feedback

Feedback Received	Action Taken	Rationale
Supportive		
General Feedback		
Support for the key considerations table in Section 2. It is viewed as a positive inclusion.	No change required.	
Support for the concise nature of the new layout. The new layout is seen as more streamlined, accessible and user friendly. The tables are called out as making the document easier to understand.		
Inclusion of the list of examples is beneficial.		
Constructive		
Credit and Recognition of Prior Learning		
Volume of learning, regarding short-form credentials, is not itself an accurate	Rather than giving the impression of a singular focus on volume of learning,	The change creates greater clarity for the reader on what to consider when deciding to



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measure of the learning outcomes achieved by the student.	we have rephrased language that referred to 'volume of learning' to reference the quality of the learning, rather than the length of time.	award credit for the completion of short-form credentials.
Dual and joint awards commonly involve awards of credit via RPL and information about this should be included.	We have included information in the guidance note about dual and joint awards and cross-referenced the guidance note with existing information about these awards.	This additional line provides greater clarity about the role of RPL and credit in dual and joint awards.
Sought definitions for formal learning, informal learning, and non-formal learning as this would give more clarity around their meanings. Suggested definitions be used from the AQF Glossary Terms.	We implemented the suggestion and directly included the definitions from the AQF in the introductory paragraphs.	The suggested change contextualises the discussion and provides additional clarity on the meaning of formal, informal, and non-formal learning.
Sought clarity on the key considerations TEQSA looks for regarding Credit and RPL. Would prefer an approach capturing all considerations TEQSA would have.	No action taken	Guidance notes are intended to provide high-level guidance to assist providers in complying Threshold Standards and are not exhaustive list of the considerations a provider or TEQSA may have.
Delivery with other parties		
Sought clarity on the overlap between the Work Integrated Learning (WIL) Guidance Note and the Delivery with Other Parties Guidance Note.	No action taken	The Delivery with Other Parties Guidance note is aimed at a high level to cover the broad range of arrangements for delivery



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		<p>with other parties. It notes WIL as a type of arrangement with other parties.</p> <p>WIL is a subset of Delivery with Other Parties, having its own guidance note to assist providers in navigating the nuances of these arrangements.</p>
<p>Sought clarity on the key considerations TEQSA looks for regarding Delivery with other parties. Would prefer an approach capturing all considerations TEQSA would have.</p>	<p>No action taken</p>	<p>Guidance notes are intended to provide high-level guidance to assist providers in complying Threshold Standards and are not exhaustive list of the considerations a provider or TEQSA may have.</p>
<p>Suggested discussing the scope and extent of legal agreements.</p>	<p>An additional paragraph has been drafted to address scope and legal agreements in the context of the responsibility provider/third party responsibilities.</p>	<p>This information will assist the reader in understanding how they engage in relationships with third parties and how responsibilities are established.</p>
<p>Suggested inclusion of the Transnational Toolkit.</p>	<p>We have included reference to the Transnational Education Toolkit.</p>	<p>The Transnational Education Toolkit is a useful resource for providers delivering education with other parties overseas.</p>
<p>Recommended the guidance note make clear the importance of the registered higher education provider ensuring other parties are engaging in the level of scholarly activity expected under the Threshold Standards.</p>	<p>We have added wording about the importance of equivalency for students and given some emphasis to the importance of scholarly activity.</p>	<p>This was not initially discussed in detail in the guidance note. However, it is an important consideration for providers when entering into agreements.</p>



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Recommended strengthening the wording around providers being accountable for all aspects of course delivery and support.	We have strengthened wording around this and implemented the recommendation.	This is an important obligation and has been self-identified by providers as requiring emphasis.
Recommended adding obligations about staffing in the table of relevant standards from the Threshold Standards.	Added information about obligations regarding staffing to the table.	Staffing is important in the delivery of education to students. Providers need to ensure its delivery partners are sufficiently staffed.
Requested clarity as to whether 'other parties refer to 'third parties' or "associated entities" or both.	No change	'Other parties' are any parties other than the primary provider. This means 'other parties' includes third parties and associated entities.
TEQSA should include more guidance and considerations on Freedom of Speech.	No action	Freedom of speech is only intended to be touched upon in a cursory manner. This Guidance Note is intended to be used for delivery with other parties and is not intended to provide detailed guidance on freedom of speech.
Clarification sought on the material change notification (MCN) requirements for third party arrangements	Added in a short paragraph clarifying TEQSA's expectations regarding MCN requirements. The paragraph will also provide a link to the guidance available on our website regarding MCN's.	This will provide clarity for a provider as to when to provide an MCN to TEQSA.
Recommendation that obligations regarding learning resources and educational support be included in the table of relevant standards from the Threshold Standards.	Included information about learning resources and educational support in the table.	Providers are required to ensure students have access to learning resources and educational support under the Threshold Standards, even if the education is delivered by a third party.



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