

Australian Catholic University

**Submission to the
Australian Tertiary Education Commission**

***Review of Research Requirements:
‘Australian University Category’ – Higher
Education Standards Framework
(Threshold Standards)***

September 2026

Submission to the Australian Tertiary Education Commission Review of Research Requirements: Australian University Category

Australian Catholic University (ACU) welcomes the opportunity to respond to the Australian Tertiary Education Commission (ATEC) consultation paper, *Review of Research Requirements: Australian University Category*. ACU recognises the Australian Government's objective of enabling greater institutional differentiation and allowing universities to concentrate research capability in areas of demonstrated strength. ACU also acknowledges that the consultation paper identifies many of the right policy tensions, including research quality, research-informed teaching, regulatory burden and transition.

However, ACU is concerned that the proposed reform would constitute a substantial change to the regulatory basis of the Australian University category, and that the consultation paper does not provide sufficient detail on the assessment framework, transition rules, safeguards or funding implications that would be required if such a reform were to proceed.

In ACU's view, the reform should not be finalised until there is a clearer and shared understanding of how research excellence, depth, scale, sustainability, impact and capability will be defined, evidenced and assessed under a specialised model. Particular consideration should be given to show how the reforms will impact regional and non-Go8 universities as well as HASS and applied disciplines where scale is more difficult to obtain. These changes risk moving Australia away from the comprehensive university that has been the underpinning for a successful sector to something that more closely resembles the current UK sector where university deficits and closures are part of the sector characteristics.

As a Mission-focused university, ACU supports the principle that universities should be able to concentrate research investment where they have genuine and mission-aligned strength. In ACU's case, this principle is consistent with a long-standing commitment to research that contributes to Australia's economic, social, and cultural priorities.

ACU does not, however, support proceeding to a narrower FoR-based research requirement without a settled framework that protects the core features of the Australian University category. The risk that needs to be managed around the proposed reforms is that without careful design, they could unintentionally weaken the research-teaching nexus, narrow Australia's disciplinary mix and restrict interdisciplinary research capability, which could weaken Australia's broader R&D competitiveness.

ACU's feedback on the consultation paper is provided below. Section I provides feedback on key issues and themes raised by the consultation paper. Section II responds to the specific consultation questions.

I. Consultation Paper and Reform - Issues

1. Consultation timing and scale of reform

ACU is concerned by the compressed consultation period for a reform of this significance. The consultation paper is dated 11 August 2026 and submissions are due on 7 September 2026. Even allowing for the policy work undertaken through the Strategic Examination of Research and Development (SERD) and Australian Universities Accord processes, this timeframe limits the sector's capacity to test the potential unintended consequences of a material change to the research requirements underpinning the Australian University category.

The current research requirements have helped sustain a shared understanding of Australian university status as connecting teaching and learning, research, and engagement excellence. A move to a specialised model may be appropriate in principle, but it should be co-designed with the sector and should not be implemented before its practical consequences for individual institutions, and the nation are fully understood.

ACU also notes that while the anticipated benefits of greater specialisation are plausible, they are not guaranteed. The consultation paper states that existing breadth requirements may disperse investment

and that greater concentration may improve critical mass and productivity. However, these are not guaranteed. Reform should therefore include monitoring to test whether these anticipated benefits are realised in practice, including effects on national research resilience, innovation, and R&D competitiveness.

2. Research excellence, depth, scale and sustainability require clearer definition

The consultation paper correctly identifies that a specialised model would require stronger expectations for research excellence, capability, and sustainability in nominated fields. It also raises the question of what would constitute a *materially higher requirement*. ACU agrees that this is the critical issue. At present, however, the consultation paper identifies the question without providing sufficient operational details to enable fully informed feedback.

ACU recommends that ATEC specify, before any regulatory amendment is finalised:

- who will assess research excellence and how responsibility will be shared between ATEC, TEQSA, the ARC and any other relevant agencies;
- how research quality, impact, depth, scale, critical mass and sustainability will be assessed in the absence of a settled post-ERA sector-wide framework for the proposed model (noting recent consultation highlighted the need for the Research Insights Capability (RIC) to avoid rankings, as evaluation should focus “on joint efforts to address shared societal challenges’ over competition”¹);
- what “materially higher” or “meaningfully higher” expectations mean in practice (e.g., how will they map onto current terminology focused on world standard);
- the period over which sustainability and performance will be measured;
- how assessment will account for fields with different publication, citation, funding, infrastructure, workforce, industry and impact profiles;
- how qualitative evidence will be used alongside metrics for HASS fields and social impact; and
- how any data-driven or automated assessment will be made transparent, auditable and subject to appropriate expert judgement.

A specialised model should not create a pseudo-objective compliance framework that privileges fields with larger output footprints, more readily measurable economic impact or more mature external funding pathways.

In particular, scale should not be treated as a proxy for excellence which may directly disadvantage regional and non-Go8 universities and some disciplines critical to Australia’s innovation ecosystem. As evidenced by Excellence in Research for Australia (ERA), smaller universities in Australia have exceptional research internationally but at scales smaller to the Go8. Maintaining this excellence will require careful calibration of thresholds. Likewise, the assessment framework must be field-sensitive and capable of recognising excellence in HASS, applied, professional, mission-led, policy, public-sector and community-engaged research domains.

3. Risks to interdisciplinary and mission-led research

ACU’s Mission and Vision are oriented toward human flourishing and the common good. Many of the most important national challenges, including health and wellbeing, education, ageing, care, responsible use of artificial intelligence, community resilience, security and social cohesion, require interdisciplinary approaches. ACU is concerned that a narrow compliance model based on selected 4-digit FoRs could unintentionally discourage interdisciplinary research if excellence is measured too rigidly through disciplinary boundaries.

At a system level, incentives to concentrate research into a smaller number of compliant fields could reduce the diversity and resilience of Australia’s research capability. This is particularly important

¹ Australian Research Council. (2026). Informing Research Insights Capability.
<https://www.arc.gov.au/evaluating-research/new-approach-research-evaluation/informing-research-insights-capability>

where research impact is generated through cross-disciplinary and international collaboration, translation into public services, engagement with communities, or long-term contribution to policy and professional practice.

ACU recommends that any specialised model include explicit design safeguards for interdisciplinary research. These should allow institutions to demonstrate coherence around mission-led and compact-aligned areas of strength that may cut across FoR boundaries.

4. Protecting the research-teaching nexus

The consultation paper appropriately identifies that a more specialised model raises questions about how scholarship, academic leadership and curriculum renewal would be supported across a university's broader teaching profile. ACU considers this issue to be fundamental.

The Australian University category should continue to signal that students are educated in an environment informed by academic staff actively engaged in research and scholarship. If the reform encourages universities to concentrate research only in nominated FoRs while reducing research-active staff and research capability elsewhere, the longer-term risk is a weakening of research-informed teaching, undergraduate and coursework postgraduate research pathways, Higher Degree by Research (HDR) supervision capacity and disciplinary renewal outside nominated areas of specialisation. This action could have unintended and far-reaching consequences that may run counter to, or limit, future research and teaching even when it is mission aligned.

ACU recommends that any revised research requirement include positive safeguards against these risks. This should be proportionate and should not require every teaching field to meet the same research excellence threshold, but it should ensure that specialised research excellence does not become detached from the student learning experience.

5. HDR capability and domestic research workforce development

ACU is concerned that insufficiently designed specialisation settings could affect Australia's domestic research training pipeline. If universities respond to a narrower research requirement by reducing research-active staffing in non-specialisation areas, there may be consequences for undergraduate and coursework postgraduate research pathways, HDR supervision, and early career researcher (ECR) development; particularly if universities cluster around a similar set of FoR codes.

This risk is particularly important in HASS, applied, professional and service-oriented fields where national workforce and innovation needs may not neatly align with conventional measures of research concentration. A specialised model should therefore require universities to explain how HDR pathways, supervisory capability and research training environments will be sustained, while also retaining sufficient capacity to develop emerging areas of research and future research workforce needs. Australia must have a pipeline that develops ECRs with interdisciplinary skills and national and global networks. If specialisation leads to both institutional and national concentration this pipeline will be placed at risk.

6. Social, cultural, public-sector and community impact must be recognised

ACU welcomes the consultation paper's broader discussion of research impact, including economic, social and environmental outcomes. However, ACU is concerned that future assessment settings could under-recognise impact that is not readily captured through commercialisation, patents, industry income, direct employment, and capital investment.

For universities such as ACU, where research can be deeply grounded in mission, the impact is often generated through collaboration with for-purpose and public-sector partners. These forms of impact can improve outcomes for all Australians, however, they may be harder to quantify through conventional economic indicators.

ACU recommends that any assessment framework explicitly recognise social, cultural, community, and policy impact. Evidence of impact should be assessed in a way that is robust and not reductive.

7. Funding, incentives and course implications require explicit clarification

The consultation paper acknowledges that changes to research requirements may interact with funding frameworks, institutional investment decisions, and broader strategic settings. ACU considers this issue insufficiently resolved. Before reforms proceed, government should clarify whether adoption of a specialised research model would have any effect on:

- Commonwealth supported places;
- the range of courses an Australian University may offer;
- research block grant settings; and
- Mission-based compacts.

Without this clarity, universities cannot assess the full institutional consequences of a specialised model. The reform should not create indirect pressure for universities to narrow course portfolios, weaken mission-aligned teaching, or reduce research-informed education in fields that serve public and workforce needs.

8. Transition, grandfathering and regulatory burden

ACU strongly recommends that existing Australian Universities should not be exposed to sudden reassessment or loss of status as a consequence of any new specialised model. The development of research strength requires long lead times. Any reform must recognise these lead times.

ACU recommends that transition arrangements include:

- grandfathering for existing Australian Universities while new evidence requirements are developed and tested;
- a staged implementation pathway with no retrospective penalty for institutions that have invested under the existing requirements;
- proportionate reassessment processes that avoid duplicative evidence requirements;
- alignment between ATEC, TEQSA, ARC and other data or evaluation processes;
- a sector consultation process on draft assessment indicators before they are embedded in regulation; and
- monitoring of unintended consequences for teaching quality, HDR capacity, disciplinary coverage, research workforce composition and national capability.

II. Consultation Questions

Question 1. Demonstrating research depth, scale and sustainability

Research depth, scale and sustainability should be demonstrated through a balanced framework that recognises strength across STEMM and HASS, traditional and non-traditional research outputs, as well as both economic and social impact. ACU is concerned that a narrow output or metric-driven approach would be inadequate. The framework must be field-sensitive and should include qualitative assessment where impact is social, cultural, community-based or policy-oriented. Critically, evaluation frameworks should not be limited to simple assessments of inputs and outputs. Evidence of excellence should also consider process-based metrics such as knowledge sharing, network development, adoptability of innovation as well the building of skills and capacity to that can support innovation at a national level. Demonstrating excellence should be sufficiently flexible to show excellence across the full research value-chain and ecosystem.

Question 2. Safeguards for research quality, scholarship, teaching and learning, student outcomes and institutional maturity

The most important safeguard is preservation of the research-teaching nexus. Universities adopting a specialised model should still be required to demonstrate that their broader teaching profile is supported by contemporary scholarship, disciplinary leadership and curriculum renewal. Safeguards should also cover HDR pathways, undergraduate and coursework postgraduate research pathways,

student access to research-informed learning and the maintenance of sufficient research-active staff to support institutional maturity. Furthermore, safeguards should preserve institutional capacity to support emerging areas and strategically important disciplines that may not be nominated as research specialisations.

Question 3. Regulatory settings for specialisation while maintaining confidence in the Australian University category

Regulatory settings should preserve the integrity of the Australian University category by ensuring that specialisation is not treated as reduced expectation. Safeguards also need to ensure that research breadth in Australia is sufficient to meet Australia's innovation needs and R&D competitiveness. In addition, while not at the same scale as Go8 universities, regional and non-Go8 universities have developed broad research excellence at world standard and above. Settings for thresholds should be calibrated to recognise the contributions such smaller universities make that are appropriate to their size and shape. This is also the case for HASS and professional disciplines where specialists are more limited. Critical mass thresholds should be set that recognise these differences.

If breadth is reduced, expectations for nominated areas should rightfully be meaningfully higher. However, those expectations should be clearly defined with sufficient consultation. Confidence in the category will depend on transparent criteria and public confidence. ACU does not consider that compliance with a specified minimum number of 4-digit FoRs should, by itself, establish research depth or institutional maturity. The framework should recognise coherent interdisciplinary and mission-led concentrations that may span FoR boundaries.

Question 4. Institutional, regulatory and system-level risks

Major risks include strategic threshold behaviour, narrowing of disciplinary coverage, under-recognition of interdisciplinary and socially impactful research, increased regulatory burden, reduced research-active staffing and infrastructure investment outside nominated areas, weakened HDR pathways, growth in teaching-only roles, uneven sector uptake and gaps in national research capability. These risks should be mitigated through safeguards for discipline-sensitive assessment; recognition of interdisciplinary research and monitoring that changes are producing anticipated benefits.

Question 5. Transition arrangements, implementation timeframes and grandfathering

ACU recommends a cautious transition model. Existing Australian Universities should be grandfathered while the new framework is developed. No existing provider should face sudden loss of status because of changes to criteria. Any implementation pathway should include draft guidance, sector testing, staged evidence requirements and monitoring of unintended consequences including consequences for smaller universities as well as HASS, emerging, and professional disciplines.

Conclusion

ACU supports institutional autonomy and recognises the potential value of allowing universities to concentrate research investment in areas of mission-aligned strength. However, ACU strongly recommends that the proposed reform should not proceed until the assessment framework, transition rules, safeguards and funding implications are clearly specified.

A specialised model must not unintentionally weaken Australia's research-teaching nexus, diminish interdisciplinary and mission-led research, narrow national capability, disadvantage social and public-sector impact, or increase regulatory burden without clear benefit. The reform should proceed only if it strengthens, rather than dilutes, confidence in the Australian University category, and ensures increased innovation capacity and Australia's R&D competitiveness.