

Australian Catholic University

**Submission to the
Higher Education Standards Committee**

***Strengthening Research Security and
National Security Expectations in the
Higher Education Standards
Framework (Threshold Standards) –
Consultation Paper***

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Submission to the Higher Education Standards Committee Consultation on Strengthening Research Security and National Security Expectations in the Higher Education Standards Framework (Threshold Standards)

Australian Catholic University (ACU) welcomes the opportunity to respond to the Higher Education Standards Committee (HESC) consultation paper, *Strengthening Research Security and National Security expectations in the Higher Education Standards Framework (Threshold Standards)*.

ACU acknowledges the importance of research security and supports ongoing efforts to strengthen the sector's ability to identify, assess and manage emerging risks. Effective research security arrangements play an important role in protecting Australia's national interests while enabling the international collaboration, innovation and knowledge exchange that underpin research excellence.

Broadly, ACU does not consider the inclusion of research security within the Threshold Standards to be the most effective mechanism for achieving the outcomes sought by Government.

While the increasingly complex and evolving research security environment is well recognised, ACU's view is that the sector's principal challenge is not the absence of regulatory obligations, but the practical implementation of an already extensive body of legislative, regulatory, funding and sector-based requirements. The University Foreign Interference Taskforce (UFIT) Guidelines already provide an established whole-of-government mechanism for supporting research security across the sector and is uniquely positioned to improve and support a coordinated approach to implementation. In ACU's view, enhancing UFIT is likely to deliver greater practical benefit than the introduction of additional regulatory obligations alone.

There remains a lack of clear and actionable information regarding how universities are expected to translate evolving policy objectives and departmental guidance into operational processes and controls. This uncertainty can make it difficult for institutions to determine the measures necessary to demonstrate compliance and effectively manage risk. Accordingly, priority should be given to providing clearer expectations, practical guidance, capability development and implementation support before introducing additional Threshold Standards requirements.

With these considerations in mind, ACU's responses to the consultation questions are set out below.

Question 1. How might current assurance mechanisms be strengthened to support provider identify, assess, manage and mitigate research security, cyber security and national security risks, while appropriately supporting and protecting staff and research students and other university-affiliated or visiting staff engaged in those activities?

Existing assurance mechanisms would be strengthened most effectively through clearer articulation of government expectations, enhanced implementation support, sector-wide capability investment, and practical examples of proportionate risk management practices.

ACU notes that several international jurisdictions have supplemented research security obligations with dedicated advisory and support mechanisms. Consideration should be given to whether enhanced government guidance, specialist advisory support, and coordinated implementation assistance would deliver greater benefits than additional regulatory requirements alone.

Question 2. Are there existing legislative, regulatory, funding or sector frameworks, including ARC funding requirements, UFIT, national security obligations and other research governance mechanisms, that should be taken into account in developing any new or clarified expectations? If so, how should those expectations be framed to avoid unnecessary duplication and support effective implementation?

Any new expectations should explicitly recognise existing obligations and focus on clear outcomes supported by practical information, rather than broad guidance or prescriptive compliance measures.

Question 3. What implementation challenges, risks or unintended consequences should HESF consider in developing advice on potential amendments to the Threshold Standards, and what measures could support effective, proportionate and risk-based implementation across the sector?

Without accompanying guidance and practical support, additional Threshold Standards requirements may encourage a compliance-focused culture rather than meaningful enhancement of research security capability. This risks increasing administrative burden without materially improving research security outcomes – inevitably leading to overly cautious decision-making that unnecessarily restricts innovation, collaboration, and research excellence.

ACU notes HESC's acknowledgement that additional governance, reporting, training and assurance requirements may impose direct and indirect costs on institutions, researchers, students and professional staff. Any proposed amendment should therefore demonstrate a clear public benefit and be accompanied by practical implementation guidance and financial support arrangements.

UFIT represents the Government's preferred whole-of-government approach to strengthening research security across the higher education sector. However, if research security requirements are going to be included in the Threshold Standards, any changes should serve as a mechanism for articulating high-level expectations regarding research security governance. It is important that any amendments should be limited to outcomes-based principles and should not duplicate or replace the implementation information, specialist advice and capability-building measures necessary to achieve effective research security outcomes. Whole of government coherence should be the critical driving force behind any proposed changes.

Conclusion

The University considers that the primary challenge facing the sector is not a lack of legislative or regulatory obligations, but the practical implementation of existing requirements within an increasingly complex operating environment. Given the breadth of government agencies and frameworks involved in research security, there is value in prioritising mechanisms that promote coordination, consistency and practical implementation support across the sector.

In ACU's view, meaningful sector uplift will be achieved not through additional compliance obligations but through clearer expectations, practical guidance, and sustained collaboration between government and the higher education sector to support effective implementation.