

Submission to the Australian Tertiary Education Commission's Review of Research Requirements: 'Australian University Category', September 2026

Executive summary

The University of Sydney has consistently maintained that setting minimum research requirements tied to disciplinary breadth encourages comprehensiveness rather than specialisation.¹

In an environment where available funding does not meet the full costs of Australian university research, requiring all universities to sustain research activity across a broad range of disciplines weakens opportunities to build critical mass, achieve economies of scale and strengthen research excellence, productivity and provider diversity. The University supports reforms that remove unnecessary regulatory requirements, reduce barriers to specialisation and the entry of new providers, while preserving institutional autonomy and public confidence in university status.

Accordingly, the University supports the Australian Universities Accord and Strategic Examination of Research and Development (SERD) recommendations to relax the minimum research requirements for registration as an *Australian University* under Part B of the [Higher Education Standards Framework \(Threshold Standards\) 2021 \(as amended 14 July 2026\)](#) as a change that would encourage specialisation in both higher education teaching and research.

At the same time, the University does not support the imposition of institutional breadth or specialisation by regulation. A diverse and resilient higher education system requires a mix of comprehensive and specialised institutions, with patterns of specialisation and breadth determined by institutions based on their missions, capabilities, demand and competition, rather than by government prescription.

Nevertheless, regulatory settings are only one of several factors shaping the behaviour of Australian universities. The current and previous Provider Category Standards have never required universities to pursue comprehensive education, research and research training profiles. Indeed, while the standards have explicitly recognised and supported provider specialisation, many institutions have continued to exhibit comprehensiveness in both their teaching and research profiles.

As the data we have included in the appendices show, Australia's universities already display considerable diversity in their missions and in the scale, intensity and quality of their research. Some serve very different communities and regions while some undertake research and research training at volumes many times greater than others (see **Appendix A**).

Yet relatively few Australian universities have chosen to adopt highly specialised models. For example, data at **Appendix B** show that in the most recent Excellence in Research for Australia (ERA) exercise (2018), participating institutions submitted on average to 16 of a possible 22 two-digit Fields of Research, while the median institution submitted for assessment in 19 fields (86 per cent). These data, together with those on the teaching profiles of Australian universities (see **Appendix C**) suggest that despite their significant differences, most Australian universities have comprehensive research and teaching profiles. The sector's diversity is real and significant but is not supported by the policy, funding and incentive structures that shape institutional behaviour.²

¹ See University of Sydney submissions to the [Coaldrake Review](#) (2019), the [Australian Universities Accord](#) (2023) and the [Strategic Examination of Research and Development](#) (2025).

² Pettigrew, Alan (2022), *Twenty years of research in Australia's universities and implications for the future*, in Horne, Julia and Thomas, Matthew (eds), [Australian Universities: A Conversation about Public Good](#), Sydney University Press, pp.177-196, esp. pp.192-93

Universities with materially different research profiles continue to operate within a largely one-size-fits-all policy and funding environment that rewards breadth in both teaching and research. External research funding is heavily concentrated in a limited number of disciplines, particularly medicine and health, engineering, and the sciences. Global university rankings place significant weight on research performance. Industrial relations requirements restrict the ability of Australian universities to focus resources in priority areas of teaching or research while the financial sustainability of most institutions depends on cross-subsidisation between different fields of education and on the use of revenue from international students to support the full costs of research and infrastructure. Together, these factors create powerful incentives for most Australian universities to strive for scale and to maintain comprehensive profiles in both teaching and research.³

As a result, changes to the Provider Category Standards alone cannot drive provider specialisation. Achieving greater differentiation will require broader reforms to the funding, policy and incentive structures that shape the behaviour of Australian universities.

Recommendations

Recommendation 1 – Encourage but not require specialisation

Amend the *Australian University* Provider Category Standard to remove the requirement to demonstrate world-standard research across 50 per cent of teaching fields and replace it with a requirement to demonstrate excellent research and research training capability in **at least three four-digit Fields of Research**.

Recommendation 2 – Keep quality requirements high and re-establish independent national assessment

Retain TEQSA's existing capability-based assessment framework for research quality while expediting design, testing and implementation of the Australian Research Council's proposed [Research Insights Capability](#) (RIC) framework as Australia's principal mechanism for evaluating the excellence, impact and depth of university research. Once the RIC is established and has the sector's confidence, TEQSA should be required to place substantial weight on institutions' RIC performance when assessing them for re-registration.

Recommendation 3 – Fix research funding sustainability

Undertake complementary reforms to improve the sustainability of university research funding, including implementation of relevant Australian Universities Accord and Strategic Examination of Research and Development (SERD) recommendations relating to the full-cost funding of research, research training and research infrastructure.

Recommendation 4 – Improve transparency and recognise diversity

Draw on leading international examples such as the [Carnegie Classification](#) in the United States to develop an Australian higher education classification framework that recognises, describes and celebrates the diversity of institutions, while providing students, governments, employers and the wider community with better information about institutional missions, teaching profiles, research intensity and research training capacity.

Recommendation 5 – Independent review

Commit to an independent review of implementation within 3 to 5 years to determine whether the changes made to the minimum university research requirements have started to achieve their intended objectives, including increased institutional differentiation and specialisation, and to identify any unintended impacts requiring changes to policy, funding or regulatory settings.

Context and background

Pre-2021 requirements: Until 2021, institutions could qualify and maintain registration as an *Australian University* by offering research degrees and undertaking research in at least three broad fields of education.

Coaldrake review changes to university research requirements (2021): Following the [2019 Review of the Higher Education Provider Category Standards](#), the Australian Government strengthened university research requirements, including those relating to research breadth and world-standard research performance.

³ Davis, Glyn (2022), *Why are Australian universities so large?*, in Horne, Julia and Thomas, Matthew (eds), [Australian Universities: A Conversation about Public Good](#), Sydney University Press, pp.41-54, esp. pp.46-47

Job-ready Graduates changes to funding for university research (2021): The strengthened minimum research requirements for Australian universities coincided with the commencement of the Job-ready Graduates (JRG) reforms, which aligned Commonwealth-supported student funding more closely with the estimated costs of teaching and scholarship only, and effectively removed the historical recognition of a research component within university base funding.

Research Sustainability Working Group (2020-21): The combination of strengthened research requirements, the JRG changes to university funding and the impact of the COVID-19 pandemic on universities' revenues from international students prompted the establishment of the Research Sustainability Working Group in 2020, resulting in a one-off \$1 billion emergency research funding package announced in October 2020. However, no enduring reforms were implemented to put funding for university research on a more sustainable footing before the Government changed in May 2022.

Australian Universities Accord (2024): The Accord concluded that Australia requires a pathway towards funding the full costs of university research and supported consideration of more differentiated institutional research profiles. It also recommended the creation of a new national evaluation framework that is less burdensome and more efficient than previous processes for assessing research quality and impact.

Strategic Examination of Research and Development (2026): The SERD found that Australia's current research requirements for Australian universities contribute to research capability being spread thinly across the sector and highlighted broader concerns relating to research funding sustainability.

A more detailed discussion of the relevant historical and policy context is included at **Appendix D**.

Responses to consultation questions

1. How should research depth, scale and sustainability be demonstrated under a more specialised model, including in relation to staffing, infrastructure, governance, research training, research integrity and research security?

Through Part A of the Threshold Standards, the [Quality of Research Determination 2021](#) and associated guidance materials on [research and research training](#) and [research requirements for Australian universities](#), TEQSA already considers a wide range of data and information related to research quality, scale, governance, sustainability, staffing, research culture and research training. Collectively, the information TEQSA already requests from institutions during the registration/re-registration process provides a substantial basis on which to assess the quality, scale and depth of an institution's research.

However, the current assessment process lacks transparency and is resource intensive for both TEQSA and institutions. TEQSA's existing capability-based research quality assessment framework should be retained while expediting the design, testing and implementation of the ARC's proposed [Research Insights Capability](#) (RIC) framework as the principal mechanism for evaluating the excellence, impact and depth of Australian university research. Once the RIC is established and has the sector's confidence, TEQSA should be required to place substantial weight on institutions' RIC performance when assessing them for re-registration, reducing the need for TEQSA to collect data and other information from individual providers.

As a general policy principle, the University of Sydney believes that research depth, scale and sustainability should be demonstrated through evidence of capability and performance in the fields in which an institution chooses to undertake research, rather than through prescribed disciplinary breadth. In principle, institutions should therefore be assessed on the quality, scale and sustainability of the research and research training they undertake, rather than arbitrary numbers of disciplines in which they teach or pursue research.

The University recognises, however, that the Accord and the SERD both concluded that some minimum research breadth requirement should remain as a defining characteristic of *Australian University* status. If such a requirement is retained, the University considers that the current approach, which links minimum research expectations to the proportion of Fields of Education in which a provider teaches, is unnecessarily prescriptive, potentially wasteful of scarce resources and may discourage institutional differentiation and specialisation.

The University therefore considers that the changes proposed by the SERD provide a more appropriate basis for assessing research depth, scale and sustainability. Consistent with the SERD recommendation, universities should be required to demonstrate excellent research and research training capability in **at least three four-digit Fields of Research**, supported by an active research community, appropriate governance arrangements, research training capability, research integrity and security systems, and sustainable resourcing.

This approach would continue to ensure that Australian universities maintain a substantive research mission while allowing institutions greater flexibility to concentrate capability and investment in areas aligned with their individual missions and strategic priorities. It would also better align regulatory requirements with the way research activity is measured and reported, moving the focus from the breadth of teaching activity to the depth, quality and sustainability of research capability.

2. What safeguards are needed to ensure a more specialised research model continues to support research quality, scholarship, teaching and learning, student outcomes and institutional maturity?

Many of the safeguards required to support research quality, scholarship, teaching and learning, student outcomes and institutional maturity already exist within the current Higher Education Threshold Standards and the Quality of Research Determination 2021. These requirements address matters including research governance, research training, staffing, infrastructure, academic and research integrity, research quality assurance and institutional oversight, and should continue to apply regardless of whether a university adopts a comprehensive or more specialised research profile.

Consistent with the University's response to Question 1, the primary safeguard should be maintaining robust expectations regarding the quality, depth, scale and sustainability of research and research training in the fields in which an institution elects to undertake research, rather than requiring research activity to be distributed across an arbitrary number of disciplines. Once the ARC's RIC is established, it should become the principal mechanism for evaluating the excellence, impact and depth of Australian university research, reducing the need for TEQSA to collect data and other information from individual providers.

More broadly, as discussed above, the University considers that the long-term quality and sustainability of the Australian university research system will depend more on improvements to funding settings than the relaxation of the requirements for *Australian University* status. Both the Accord and the SERD reviews identified the importance of developing a pathway towards funding the full costs of research and addressing broader concerns regarding research sustainability. Changes to the Provider Category Standards may enable greater specialisation but will not, on their own, drive institutional specialisation. Achieving greater differentiation will require broader reforms to the funding, policy and incentive structures that shape the behaviour of Australian universities.

3. How should regulatory settings be designed to enable greater research specialisation while maintaining confidence in the Australian University category?

Consistent with the University's response to Question 1, until the ARC's RIC is in place, we believe that TEQSA's existing framework provides a substantial basis for assessing research quality and that supporting specialisation should not require a fundamentally different approach so much as a different application of existing assessment criteria. Regulatory settings should be adjusted to focus on the quality, depth, scale and sustainability of research and research training undertaken by an institution, rather than the breadth of disciplines in which research activity occurs, subject to any minimum threshold adopted for Fields of Research.

Confidence in the *Australian University* category would be maintained by continuing to require institutions to demonstrate a substantive and sustainable research and research training capability in at least a minimum number of Fields of Research, supported by appropriate governance arrangements, staffing, research integrity and quality assurance. Regulatory expectations relating to research quality, integrity and institutional sustainability should remain robust regardless of whether a university adopts a comprehensive or more specialised research profile.

Consistent with this approach, the University notes that confidence in the *Australian University* category may ultimately be strengthened not through the Provider Category Standards, but through greater transparency regarding institutional mission, research intensity and research training capability. In our [submission to the 2019](#)

[Review of the Higher Education Provider Category Standards](#), we proposed the development of a non-legislative national higher education classification framework for Australia, drawing on the [Carnegie Classification framework](#) in the United States, to provide prospective Australian and international students, their families, governments and employers with better information about institutional characteristics.⁴ The adoption of such an approach by Australia alongside re-establishment of regular independent research quality and impact assessment by the ARC, would recognise, promote and foster diversity in Australia's universities.

4. What institutional, regulatory or system-level risks could arise during implementation, and how could these be mitigated through regulatory design, transition arrangements, guidance or monitoring?

The University considers that the risks associated with relaxing the current research breadth requirements should not be overstated and are manageable. This view is informed in part by consideration of international benchmarks similar to those discussed in the consultation paper (p.10). Comparable federated higher education systems, including those of the United States and Canada, have generally sought to describe and classify institutional diversity rather than regulate university status through highly prescriptive requirements imposed at the national level.

We have also considered that Australia's core funding arrangements for public universities no longer recognise a dedicated research component within base funding, while competitive grants and research block grants fall well short of meeting the full costs of research and the infrastructure required to support it. Continued reliance on revenue from international students to bridge this gap is neither a reliable nor sustainable funding model for individual institutions or the nation.

As a consequence, retaining the current breadth requirements risks encouraging some institutions to maintain research activity primarily for regulatory compliance purposes rather than because it can be sustained at sufficient scale or quality. This represents a potentially inefficient use of scarce public and institutional resources, reducing opportunities to concentrate capability, achieve economies of scale and strengthen research excellence in areas of demonstrated strength, strategic priority and national need.

One potential risk is that some institutions continue to spread their available resourcing thinly, undertaking low-quality research in many fields, but maintain university status by demonstrating excellence in a small number of disciplines. This risk would be mitigated through the transparency that a return to regular independent national assessment of research excellence will provide as well as TEQSA's ongoing application of the research and research training quality requirements under Part A of the threshold standards.

A second potential risk, if some institutions do decide to pursue specialisation due to relaxed research requirements, is that there is a reduced capacity for research training in certain fields and in some regions of Australia. This risk could be mitigated by ATEC encouraging collaboration between universities to develop hub and spoke models for research supervision.

A third potential risk is that some institutions may seek to narrow their research activity too rapidly, potentially affecting research training capacity, supervision arrangements, workforce planning or existing research partnerships. This risk could be mitigated through appropriate transition arrangements, including sufficient time for institutions to adjust research strategies, staffing profiles, HDR training activities where required, and inclusion of institutions' research strategy and profiles in mission based compact negotiations.

A fourth possible risk is that institutional missions and research profiles become less transparent to prospective students, governments and industry partners as research specialisation increases. Once in place, the information about research quality, impact and depth produced by the ARC's RIC should address this risk. Over time, this risk could also be addressed through the development of a national higher education classification framework that recognises differences in institutional scale, mission and research profiles.

A fifth potential risk is that changes to research requirements contribute to reductions in research and teaching capability in nationally important humanities, social science, professional and creative fields that typically attract relatively low levels of external research funding. This risk could be addressed through mission based compacts

⁴See [Carnegie Classification of Institutions of Higher Education](#), United States

negotiated with ATEC and targeted research funding to ensure sustainability of fields considered critical to Australia's sovereign, social and cultural capability.

Finally, the University considers that the greatest risk is not that excessive specialisation will occur, but that changes to provider category requirements alone will fail to achieve the level of institutional diversification anticipated by the Accord, the SERD and the Government. As outlined above and as both the Accord and SERD reviews observed, the behaviour of Australia's universities is shaped by a much broader set of funding, reputational and market incentives than provider regulation alone. Regulatory reform should therefore be accompanied by continued consideration of the funding and incentive structures that influence the teaching and research strategies of Australia's universities. This risk could also be mitigated through the four-year mission based compact negotiation process and targeted funding to support core research capability, as ATEC builds its understanding of each institution's individual mission, priorities and operating circumstances. Both TEQSA and ATEC will have important complementary roles in supporting research specialisation. They will need to align their respective policies and practices to ensure coherent outcomes that benefit the system while strengthening individual institutions.

5. What transition arrangements, implementation timeframes and grandfathering provisions, if any, should apply to existing Australian Universities, Australian Universities with a specialised focus, prospective applicants and providers currently progressing under existing transitional arrangements?

The University supports a measured transition to any revised requirements for *Australian University* status.

Existing *Australian universities* should retain their current registration status and be assessed against any revised requirements as part of their normal re-registration cycle, rather than through a separate compliance process.

Given that the reforms proposed by the Accord and SERD would relax, rather than strengthen, the current research breadth requirements, extensive grandfathering arrangements should not be necessary. Providers already progressing through existing re-registration arrangements should be permitted to continue under those arrangements or elect to be assessed against any revised requirements, whichever is more favourable.

Any revised framework should be accompanied by updated guidance from TEQSA clarifying expectations regarding research quality, research training, governance, research integrity, research security and the demonstration of capability within Fields of Research.

Consistent with the University's responses to Questions 1 - 4, the purpose of reform should be to enable greater institutional flexibility rather than to mandate changes to institutional missions or research profiles.

Implementation arrangements should therefore minimise unnecessary regulatory burden while providing institutions with sufficient certainty to incorporate any changes into their long-term strategic planning.

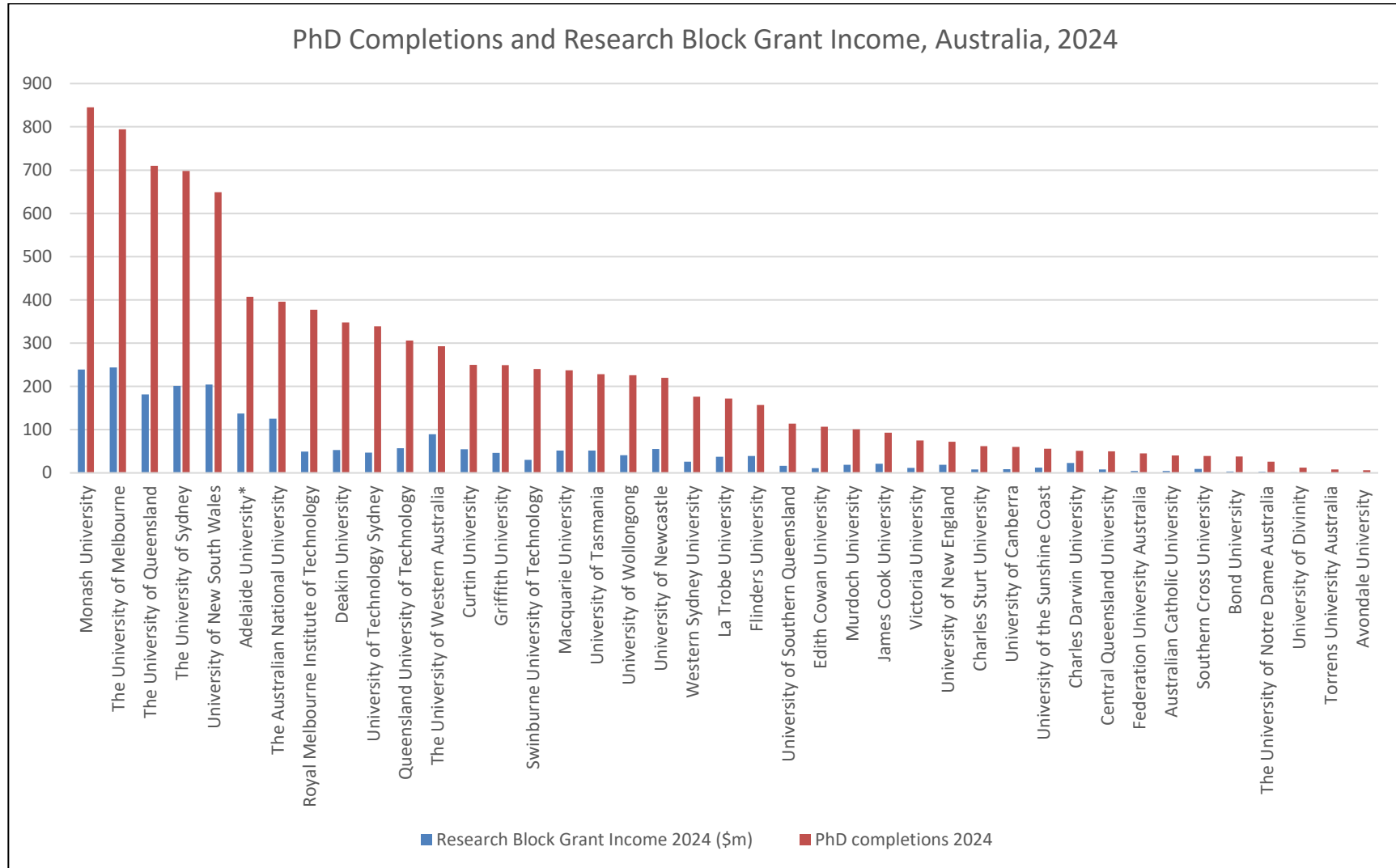
Appendices

- A** Australian universities' PhD completions and Research Block Grant income, 2024
- B** Visual summary of Excellence in Research in Australia 2018 ratings by university and two-digit unit of assessment
- C** Visual summary of Australian university teaching profiles by broad field of education, 2024
- D** Detailed relevant historical context and background

References

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Appendix A



*Combines data for the former University of Adelaide and the University of South Australia

Source: Department of Education, [Consolidated time series datasets - Department of Education, Australian Government](#)

Appendix B

Visual summary of Excellence in Research in Australia 2018 ratings by university and two-digit unit of assessment

2018	01 Mathematical Sciences	02 Physical Sciences	03 Chemical Sciences	04 Earth Sciences	05 Environmental Sciences	06 Biological Sciences	07 Agricultural and Veterinary Sciences	08 Information and Computing Sciences	09 Engineering	10 Technology	11 Medical and Health Sciences	12 Built Environment and Design	13 Education	14 Economics	15 Commerce, Management, Tourism and Social Sciences	16 Studies in Human Society	17 Psychology and Cognitive Sciences	18 Law and Legal Studies	19 Studies in Creative Arts and Writing	20 Language, Communication and Culture	21 History and Archaeology	22 Philosophy and Religious Studies	Number of areas
The University of Melbourne	5	5	5	5	5	5	4	5	4	4	5	4	5	5	5	5	5	5	4	5	4	4	22
The University of Queensland	5	5	5	5	5	5	5	4	4	5	4	4	4	4	4	4	4	4	4	4	4	4	22
The University of Sydney	5	5	5	4	5	4	4	5	5	4	5	4	4	4	4	4	4	5	4	5	5	5	22
University of New South Wales	5	5	5	5	5	5		5	5	5	4	5	5	5	5	5	5	5	4	4	4	4	21
Monash University	4	5	5	4	4	5		4	5	5	5	5	3	4	4	4	4	4	4	4	5	5	21
The Australian National University	5	5	5	5	5	5	5	5	5	5	4		3	4	4	5	4	5	3	5	5	5	21
The University of Western Australia	5	5	4	4	5	5	4	4	4		5	3	4	3	3	4	5	4	4	4	5	3	21
The University of Adelaide	5	5	5	5	4	5	5	4	5	4	5	3	2	4	3	3	4	4	4	3	4	4	22
Queensland University of Technology	5	4	4	4	5	4		4	4	5	5	4	4	3	3	3	3	4	3	4			19
University of Newcastle	4	5	4	4	5	5		3	4		4	3	3	2	3	3	5	3	3	4	3		20
Curtin University of Technology	4	4	5	4	4	4	4	3	4		4	3	3	3	3	3	4	2	3	3	2		20
University of Tasmania	3	3	3	5	5	5	5	2	3	4	2	3	3	2	3	3	4	4	3	3	4	3	21
Macquarie University	4	5	4	4	5	5	5	4	4		4		4	3	3	3	3	3	4	3	4		20
Griffith University		5	5	3	5	4	3	3	4	5	4	3	3	2	3	4	3	4	3	3	3		20
University of Wollongong	4	5	5	4	4	4		4	4		4	3	3	2	3	3	3	4	3	4	4	3	19
University of South Australia	5		4		5	4		3	5		4	3	3	2	4	3	5	3	3	3			16
La Trobe University	4	5	5		3	5	5	3	4		4		3	3	3	3	5	4	3	4	4	3	19
Deakin University		4			5	4	5	3	4	5	5	2	4	4	4	3	5	4	3	3	3		19
Royal Melbourne Institute of Technology	4	5	4	2	4	3		3	4	2	4	4	3	3	3	3	3	3	3	4			19
University of Technology Sydney	4	5	4		5	4	5	4	4		4	4	3	4	4	3	4	4	3	3	3		19
Flinders University		4	3	3	3	4	3	2	3	4	4		3	2	2	3	4	3	4	3	3	3	20
James Cook University	4	3	4	4	5	5	4	2	3	4	4		3	2	2	3	1	3	2	3	4		20
University of Western Sydney	4	3	3		5	5	5	3	3		4	3	3	2	2	3	4	3	3	4	3	3	20
Swinburne University of Technology	5	5	4			3		4	5	4	4	3	3	3	3	3	5	3	3	3			17
Charles Darwin University					4	4	4	4	2		5		2		1	2							9
Murdoch University	4	4	3	3	4	4	4	3	3	5	4		3		2	2	3	2	3	3	2	2	20
University of New England	5		3	4	5	4	5				4		3	2	1	3	4	3	2	2	3	3	17
Victoria University	4					4		3	5		4		3	2	2	3	3	2		2	2		14
Edith Cowan University			5	4	5	4		2	4		4		2	2	2	2	2		2	3			14
Charles Sturt University		5			3	2	4	3	2		2		3	2	2	3	1	2	2	2	2	3	17
University of Southern Queensland	4	5	5			4	3	4	3	4	5		2	2	2	4	2	2	2	2			18
University of Canberra					5	2	3	3			4		3	2	2	4	3	3	3	3			13
University of the Sunshine Coast		1			5	4	5	2	3	5	3		2		2	3	4		2	3			14
Southern Cross University				5	4	4	5		4		4				2	2			2				10
Australian Catholic University											5		4		2	3	5	3	2	2	3	4	10
Central Queensland University	5				3	3	4	3	4		3		2	2	2	5		2					13
Federation University Australia	3			2	5	1		3	2		4		2		2	3	3		2		2		13
Bond University											4	2	1		2	1	2	3					7
The University of Notre Dame Australia											3		2		1	1				2	2		7
University of Divinity																				2	2		1
Torrens University Australia																					2		0

5	Well above world standard
4	Above world standards
3	World standard
2	Below world standard
1	Well below world standard

Appendix C

Visual summary of Australian university teaching profiles by broad field of education 2024

Domestic Equivalent Full Time Student Load % of Provider's Total EFTSL, 2024	Agriculture Environmental and Related Studies	Architecture and Building	Creative Arts	Education	Engineering and Related Technologies	Health	Information Technology	Management and Commerce	Natural and Physical Sciences	Society and Culture
The University of Melbourne	2.8%	3.6%	11.7%	5.0%	3.9%	14.8%	3.6%	10.5%	18.5%	25.8%
Monash University	1.4%	1.3%	4.2%	4.5%	7.5%	18.0%	5.6%	10.7%	20.2%	26.6%
The University of New South Wales	0.7%	3.6%	5.7%	2.8%	13.8%	8.9%	11.1%	14.9%	20.8%	17.6%
The University of Sydney	0.7%	2.6%	6.6%	4.3%	8.1%	25.2%	4.5%	9.0%	15.8%	23.3%
The University of Queensland	2.7%	1.2%	3.6%	2.8%	11.9%	21.8%	4.2%	7.6%	19.9%	24.4%
Adelaide University*	1.3%	3.5%	5.7%	7.1%	6.9%	24.9%	6.0%	9.7%	13.2%	21.6%
The Australian National University	2.9%		3.8%		4.9%	5.4%	5.5%	7.3%	19.3%	50.8%
The University of Western Australia	2.3%	1.9%	4.5%	1.5%	8.5%	14.1%	4.4%	11.5%	23.8%	27.6%
Queensland University of Technology	0.1%	5.4%	8.8%	7.5%	9.0%	12.9%	9.6%	16.0%	11.3%	19.3%
The University of Newcastle	1.6%	4.1%	4.0%	12.7%	7.2%	25.8%	1.4%	5.0%	17.7%	20.4%
Curtin University	0.7%	4.7%	8.8%	14.6%	8.5%	21.5%	3.9%	9.4%	13.2%	14.8%
Deakin University	1.7%	1.5%	4.6%	11.0%	2.3%	19.1%	5.5%	10.5%	11.8%	31.9%
Macquarie University	0.7%	0.3%	6.9%	6.8%	2.8%	5.8%	7.9%	17.0%	12.3%	39.4%
University of Tasmania	5.4%	1.3%	5.9%	10.0%	3.9%	38.6%	2.1%	2.6%	12.2%	18.0%
RMIT University	0.8%	7.3%	14.8%	2.0%	16.2%	7.1%	9.5%	17.0%	9.9%	15.4%
University of Technology Sydney	0.9%	4.8%	8.9%	1.1%	14.6%	11.2%	9.5%	17.9%	13.8%	17.2%
Griffith University	0.8%	1.2%	10.1%	9.9%	3.6%	18.0%	3.8%	11.6%	13.1%	28.0%
University of Wollongong	1.6%		5.7%	13.9%	6.3%	16.4%	4.8%	9.9%	18.4%	23.0%
Flinders University	0.1%		7.3%	8.1%	4.8%	35.0%	2.3%	4.4%	14.6%	23.2%
La Trobe University	1.9%	0.1%	1.4%	11.6%	0.9%	35.8%	5.9%	6.2%	12.3%	23.9%
Swinburne University of Technology		1.8%	14.0%	25.0%	6.9%	5.0%	9.7%	11.1%	5.9%	20.6%
Western Sydney University	0.5%	5.5%	4.4%	6.9%	7.0%	24.6%	3.4%	9.0%	11.2%	27.6%
Charles Sturt University	5.8%	0.0%	1.4%	17.2%	0.4%	28.0%	3.6%	3.3%	9.7%	30.5%
James Cook University	0.9%	0.1%	1.2%	7.8%	3.5%	47.8%	2.5%	3.6%	17.6%	15.0%
Murdoch University	3.8%	0.1%	4.4%	12.7%	1.4%	22.1%	4.5%	5.9%	16.9%	28.1%
University of New England	4.2%	1.5%	2.8%	19.2%	0.4%	9.3%	2.6%	7.3%	16.5%	36.1%
University of Southern Queensland	1.2%	0.4%	5.6%	20.7%	12.1%	21.2%	2.8%	5.6%	11.2%	19.4%
University of the Sunshine Coast	1.9%	0.4%	7.6%	10.0%	3.2%	28.2%	3.6%	6.3%	17.2%	21.7%
Victoria University	0.6%	3.5%	1.5%	22.0%	2.9%	25.8%	2.8%	6.2%	8.5%	26.3%
Edith Cowan University	0.4%	0.0%	8.2%	24.6%	2.7%	25.8%	5.1%	7.5%	7.1%	18.6%
Southern Cross University	2.0%	0.0%	3.2%	24.9%	2.0%	28.8%	1.6%	6.8%	11.8%	18.9%
University of Canberra	0.4%	4.2%	9.8%	11.4%	1.9%	18.4%	7.1%	8.1%	12.3%	26.2%
CQUniversity	0.8%	1.2%	3.9%	14.1%	6.1%	41.8%	2.1%	5.3%	12.0%	12.7%
Charles Darwin University	0.4%	0.7%	3.2%	15.8%	2.7%	38.3%	3.3%	2.2%	12.6%	20.8%
Australian Catholic University			1.3%	27.7%	0.3%	40.0%	0.8%	2.8%	6.0%	21.0%
Federation University Australia	1.2%		2.5%	20.5%	3.0%	38.7%	2.6%	2.7%	10.8%	17.9%
Bond University	0.1%	2.7%	3.3%	0.1%	0.2%	51.2%	0.7%	10.3%	7.1%	24.3%
Australia	0.1%	0.3%	2.4%	17.9%		42.5%	0.7%	3.7%	4.9%	27.4%
University of Divinity										100.0%
Torrens University Australia		2.7%	28.1%	10%	0.1%	26.0%	8.1%	26.8%	0.6%	6.6%
Avondale University	0.6%		6.6%	25.5%	0.0%	36.8%	0.8%	5.8%	3.9%	19.9%
Total	1.4%	2.4%	6.5%	9.7%	6.4%	21.1%	5.3%	9.9%	13.8%	23.6%
*Combines The University of Adelaide and the University of										
Source: Department of Education (Sept 2025) Perturbed Student Load Pivot Table 2024										
										% of Total EFTSL
										0.03% to 5.00%
										5.01% to 10.00%
										10.01% to 15.00%
										15.01% to 20.00%
										20.01% to 25.00%
										>25%

Appendix D – Detailed relevant historical context and background

The current research requirements for registration under the *Australian University* category were introduced in 2021 following the Morrison Government's acceptance of recommendations made by Emeritus Professor Peter Coaldrake AO in his 2019 [Review of the Higher Education Provider Category Standards](#) (Coaldrake Review). These reforms introduced new minimum expectations relating to both the scale and quality of research undertaken by Australian universities.

Prior to 2021, a provider could maintain registration as an *Australian University* by demonstrating that it offered Master Degree (Research) and Doctoral Degree (Research) programs in at least three broad fields of education and undertook research in at least those fields. The 2021 reforms strengthened these standards by requiring universities to:

- deliver Doctoral Degrees (Research) across at least three, or 50 per cent, of the broad fields of education in which they teach, whichever is greater; and
- periodically demonstrate to TEQSA that they undertake world-standard⁵ research across the same minimum breadth of fields.⁶

The strengthened minimum research requirements for Australian universities legislated in 2021 coincided with the start of the Job-ready Graduates (JRG) changes to core higher education funding, which effectively separated teaching funding from the historic implicit contribution to universities' research capability by aligning funding linked to Commonwealth-supported student enrolments with the estimated average cost incurred by universities delivering only their teaching and scholarship functions.⁷

Before 2021, successive governments and reviews had recognised that the core research functions of Australian universities have historically been supported through higher education *base funding*.⁸ For example, the 2011 [Base Funding Review](#) estimated the research share of base funding at between 6 and 10 per cent, while in 2014 the Australian Government proposed legislation that valued the research share at 30 per cent.⁹ Recognition of a research component in base funding reflected the longstanding assumption that Australian universities combine teaching, research and research training as integrated core functions. This principle remains reflected in the Higher Education Provider Category Standards, which require universities to undertake research, deliver research training and employ staff who are both appropriately qualified and active in research.

The JRG changes reduced average funding per student by six per cent and relied in part on reallocating funding previously recognised as critical for supporting universities' core research capability, to fund growth in Commonwealth-supported places. As a result, since 2021, the base funding Australia's public universities receive to support their core functions has not included a component explicitly intended to support the costs of sustaining research capability. Together, the JRG and Provider Category changes of 2021 established an operating environment in which research expectations for universities were substantially strengthened while simultaneously moving the core funding framework away from recognising the costs of sustaining the baseline research capability necessary to sustain the minimum research capability associated with university status in Australia.

⁵ The benchmark standards for research are: a. **research that is 'world standard'** measured using best practice indicators, and/or b. **research of national standing in fields specific to Australia**, in the case of research that is not easily captured by existing standard indicators.

⁶ For new providers entering under the 'Australian University' category, they must demonstrate that they undertake research in at least three, or at least 30 per cent, of the broad (2-digit) fields of education in which they deliver courses of study, whichever is greater.

⁷ Payne, Tim (2022), *The 2020 Job-ready Graduates Package and what it means for students*, in Horne, Julia and Thomas Matthew (eds), [Australian Universities. A Conversation about Public Good](#), Sydney University Press, pp.165-166

⁸ The Commonwealth provides funding for Commonwealth-supported Places (CSPs) under Part 2-2 (Commonwealth Grant Scheme) of the *Higher Education Support Act 2003* (HESA). A CSP is jointly funded through a CGS subsidy - also known as the Commonwealth contribution amount - and a student's contribution amount. The sum of these amounts for all CSPs for an individual provider is commonly referred to as a provider's 'base funding'.

⁹ Extract from the Explanatory Memorandum to the [Higher Education and Research Reform Amendment Bill 2014](#): 'Private universities and non-university higher education providers will be eligible for Commonwealth funding for undergraduate courses. Student places at these providers will be funded at 70 per cent of the rate for universities on the basis that these providers are not required to sustain the same kind of research or meet the same community service obligations as universities.'

In July 2020, the then Minister for Education, the Hon. Dan Tehan MP, established the Research Sustainability Working Group to examine sustainable research funding arrangements during and beyond the COVID-19 pandemic.¹⁰

In October 2020, the Morrison Government announced a one-off \$1 billion emergency research funding package, recognising that the collapse in revenue from international students represented a significant risk to Australia's university research system and sovereign capability.¹¹ However, no enduring reforms were implemented to put funding for university research on a more sustainable footing before the Government changed in May 2022.

In November 2022, the Albanese Government asked the Australian Universities Accord to consider how to support a system of university research that delivers for Australia, securing the future of the research pipeline as part of a broader review of the adequacy of higher education funding settings.¹² The Accord identified the need for a pathway towards funding the full cost of university research and recommended a root-and-branch examination of Australia's research funding and governance arrangements. It also recommended the creation of a new national evaluation framework that is less burdensome and more efficient than previous processes for assessing research quality and impact. The Accord also supported greater institutional differentiation through relaxing the current minimum research requirements while safeguarding public confidence in university status.¹³ These issues were subsequently considered through the Strategic Examination of Research and Development (SERD), announced in December 2024.¹⁴

The SERD concluded that Australia's university research requirements have contributed to resources being spread too thinly across the sector, limiting the capacity of institutions to build scale in areas of national need and global competitiveness. It also found that the value of competitive research funding had been declining in real terms, that most competitive grants do not meet the full costs of research and universities remain heavily reliant on international student fees to sustain research and support infrastructure, highlighting the central importance of funding sustainability alongside regulatory reform.¹⁵

The Australian Tertiary Education Commission (ATEC) is now seeking views on whether the Provider Category Standards' breadth-based requirements continue to support research excellence, institutional differentiation and productivity, or whether alternative approaches could better support research specialisation while maintaining confidence in the *Australian University* category.¹⁶

Finally, it is also important to note that any relaxation of the current research breadth requirements should not diminish existing safeguards relating to the use of the title *University* in Australia. The use of the word *university* would remain protected through the *Business Names Registration Act 2011*, associated regulations and ministerial consent processes, which require any entity seeking to use the title to satisfy criteria linked to registration and recognition under Australia's higher education regulatory framework.¹⁷

¹⁰ Tehan, The Hon. Dan (1 July 2020), Media Release, [Research sustainability working group](#)

¹¹ Visontay, Elias (6 October 2020), [University research gets \\$1bn in Australian budget after loss of international student revenue](#), Guardian Australia

¹² Clare, The Hon. Jason (16 November 2022), Media Release, [Universities Accord](#)

¹³ O'Kane, Mary et al. (25 Feb 2024), [Australian Universities Accord Final Report](#), Recommendations 24 and 37

¹⁴ Husic and Clare, the Hons Ed and Jason (2 December 2024), Media Release, [Landmark review of R&D system to unlock growth](#)

¹⁵ Denholm, Robyn et al. (17 March 2026), [Ambitious Australia: Strategic Examination of Research and Development](#)

¹⁶ ATEC (11 August 2026), [Review of Research Requirements: 'Australian University Category'](#)

¹⁷ Department of Education (modified January 2024), [Guidelines for the use of the word 'university'](#)