



Australian Government



ATEC

Australian Tertiary
Education Commission

11 August 2026

Review of Research Requirements: 'Australian University Category'

Higher Education Standards Framework (Threshold Standards)





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Review of Research Requirements: ‘Australian University Category’

On 13 May 2026, the Hon Jason Clare MP, Minister for Education, announced the Government would progress the recommendation from the 2025 Ambitious Australia: Strategic Examination of Research and Development Report (SERD Report)¹ related to university research specialisation. The Minister for Education subsequently requested advice from the Australian Tertiary Education Commission (ATEC) on whether existing regulatory settings appropriately support research excellence, institutional differentiation and productivity objectives, informed by feedback from across the higher education sector regarding opportunities for greater research specialisation, including the extent to which amendments to the Higher Education Standards Framework (Threshold Standards) may be necessary to support these objectives.

Purpose

The SERD Report identified that universities may be able to achieve greater research excellence, impact and productivity by concentrating resources and capability in areas of demonstrated strength, rather than maintaining research breadth across a wide range of teaching fields. Further suggesting that this may support stronger institutional differentiation, research scale and strategic investment while maintaining the quality expectations associated with university status. In practice, this could involve replacing or reducing existing breadth-based research requirements with greater focus on demonstrating excellence, scale and sustainability in a smaller number of research fields.

This paper supports ATEC’s consideration of how different settings may enable a more differentiated, high-quality and sustainable higher education research system, consistent with the Government’s position to progress the SERD recommendation on research specialisation. The purpose is not to test whether research specialisation should occur, but to inform how any potential reform might be designed, sequenced and implemented to provide greater flexibility to build research scale in areas of strength while maintaining research quality, student outcomes and public confidence in the Australian University category. The paper is framed around:

- the policy objective of enabling greater research focus, scale and university differentiation;
- the tensions between flexibility, research quality, scholarship, and teaching and learning;
- how research is currently addressed through the Threshold Standards; and
- whether amendments to the Threshold Standards are necessary.

It also seeks views on how any amendments may be designed and implemented to realise the benefits of reform while mitigating risks

SERD Report

The Australian Government appointed an independent panel to lead the Strategic Examination of Research and Development (SERD) in 2024. The panel's final report reflects a year-long examination of the challenges and opportunities facing Australia’s research and development

¹ [Ambitious Australia – Strategic Examination of R&D Final Report](#)

system, including how regulatory settings could support institutional diversity, research scale and areas of university research strength. The potential for university specialisation was considered as part of this work, including through the SERD issue paper, Foundational research: Creating knowledge².

The SERD Report identifies concerns that current research requirements may limit universities' capacity to focus investment and capability in areas of comparative strength. It recommends reforming registration requirements for research breadth to enable universities to build scale in areas of competitive and comparative advantage. Recommendation 3 is of particular relevance to this consultation:

“Allow universities to achieve research specialisation by reforming registration requirements to reduce the condition for research breadth and enable each to build scale in areas of competitive and comparative advantage.”³

The SERD Report also recommended an implementation pathway to enable institutional research specialisation:

“Revise the provider category standards to provide universities the flexibility to undertake excellent research in 3 or more 4-digit Fields of Research (FoR) and remove the requirement to undertake research at world standard for 50 per cent of the fields they teach in.”⁴

The SERD Report proposes a more flexible research framework that would enable universities to pursue greater research specialisation, while maintaining an appropriate research threshold for university status.

Australian Universities Accord Final Report

The Australian Universities Accord Final Report⁵ (Accord Report) also supported greater institutional differentiation. Recommendation 37(f) identifies possible revisions to the Provider Category Standards, including reinforcing scholarship and engagement in all universities. Recommendation 37(f)(ii) recommends:

“consider relaxing the current requirement to meet benchmark levels of research in at least three broad Fields of Education”⁶

The Accord Report suggests a possible recalibration of the breadth requirement to support provider diversity, mission differentiation and research specialisation, while retaining appropriate safeguards for students, scholarship, engagement and public confidence in university status.

² Foundational research: Creating knowledge

³ Ambitious Australia – Strategic Examination of R&D Final Report, p49

⁴ Ibid.

⁵ Australian Universities Accord - Final Report.pdf, pp257-266

⁶ Ibid.

Focus of consultation and reform objectives

Australia's research environment has become increasingly competitive, with universities expected to sustain world-class research performance across a growing range of fields while operating within constrained financial and workforce settings. Research infrastructure, specialist facilities, research training capability and highly skilled academic staff all require significant and sustained investment to maintain internationally competitive research performance.

Existing research breadth requirements may create incentives for universities to distribute research investment across a larger number of fields than would otherwise align with their strategic strengths. While these arrangements have supported broad research capability, they may inhibit universities from focusing on investment to achieve critical mass and develop globally recognised areas of excellence. This raises questions about whether the current balance between research breadth and research depth remains the most effective mechanism for supporting research quality, impact, productivity and long-term sustainability.

Consistent with the Government's position to progress the SERD recommendation, this consultation focuses on how reform could be designed and implemented to enhance the research and development system, including how regulatory settings could provide sufficient flexibility for universities to align research activity with their institutional mission, research focus, regional priorities, workforce needs and areas of demonstrated strength.

While the Threshold Standards provide some flexibility for universities to develop a specialised focus, questions have been raised about whether existing breadth-based requirements limit opportunities overall for universities to pursue greater research specialisation.

If a specialised model were made available more broadly, what safeguards, design settings and transition arrangements would be needed to ensure universities can demonstrate research depth, scale and sustainability while realising the benefits of reform and mitigating risks.

Key objectives of proposed reforms

The SERD Report suggests current settings may favour broad-based university models over specialised approaches that allow universities to build greater depth, scale and capability in areas of comparative advantage. A model that allows universities to choose to specialise could enable them to demonstrate research excellence through greater focus and scale in selected areas, rather than through research breadth across a proportion of teaching fields.

Potential benefits of a more specialised model may include stronger concentration of expertise, greater research scale and critical mass, more targeted investment in research capability and infrastructure, enhanced collaboration, clearer institutional missions, and improved capacity for universities to build internationally recognised areas of research strength.

A specialised approach would need to be accompanied by higher expectations regarding research quality, capability and sustainability in the nominated fields of research. The intent would not be to lower research expectations, but to enable universities to demonstrate research excellence through stronger capability, sustainability and performance in their nominated areas of research. It would also preserve institutional autonomy by allowing universities to determine their own research priorities and investment decisions, consistent with their mission and strategic objectives.

To support confidence in a more specialised model, any revised approach would need to be capable of clear and consistent regulatory assessment. This includes how research excellence, capability, and sustainability would be defined, measured and evidenced across universities with

different research profiles. A key consideration is whether any changes to the Threshold Standards can provide greater flexibility for research specialisation while maintaining confidence in the quality and integrity of the Australian university sector. It is equally important to examine whether a more focused research requirement could affect other aspects of a university's mission, including its ability to sustain research capability and areas of research strength over time.

Reform would also need to maintain clarity in the Australian University category and distinguish appropriately between provider categories. This would require universities to demonstrate coherent and sustainable research strategies, sufficient research-active staff, appropriate infrastructure, governance, research integrity, and a research environment that supports research training, supervision and academic leadership.

Ultimately decisions about institutional mission, research focus and investment remain matters for universities themselves, consistent with principles of institutional autonomy and academic freedom. Reforms to the research requirements should preserve institutional autonomy while providing greater flexibility for universities to pursue their distinct missions and strengths.

Research productivity and system performance

Research productivity is a key consideration in assessing whether greater research specialisation could improve system performance. Concentrating research capability in areas of demonstrated strength may enable universities to reduce fragmentation of investment and maximise the return on investment in research infrastructure and capability development. This has the potential to deliver broader national benefits through a more coherent and productive research system, which aligns national investment with areas of comparative advantage, to achieve stronger research outcomes for the economy and community.

Greater concentration of expertise may also create opportunities for stronger collaboration with industry, government and international partners, support participation in large-scale research initiatives, and improve the capacity of universities to translate research into economic, social and environmental outcomes. At the same time, any productivity benefits would need to be balanced against broader objectives relating to capability, teaching and learning, student opportunity and the long-term resilience of the national research system.

Current settings

The Threshold Standards set the minimum requirements for higher education providers, including the criteria that distinguish the Australian University category from other provider categories. The Tertiary Education Quality and Standards Agency (TEQSA) assess whether providers meet these requirements. To be registered in the Australian University category, providers must demonstrate an appropriate level of academic standing, research capability and institutional maturity. Under the current Part B settings, an Australian University is required to undertake world-standard research in:

- at least 50 per cent of the 2-digit Fields of Education⁷ (FoE) in which they deliver courses, or
- a minimum of three broad FoE, whichever is greater.

⁷ [Field of Education | Australian Bureau of Statistics](#)

Universities with a specialised focus must demonstrate research at the required standard in all FoE in which they exercise self-accrediting authority, rather than a proportion of fields as applies to universities with a non-specialised focus.

Fields of Education (FoE) and Fields of Research⁸ (FoR) are classification frameworks used to describe, respectively, the areas in which higher education courses are taught and the disciplinary areas in which research is conducted. FoE classifications relate to teaching and course delivery, while FoR classifications are used to categorise research activity and research outputs according to the field of research. Both are used in the Australian and New Zealand Standard Research Classification (ANZSRC)⁹ and are referred to in the Threshold Standards to assess the relationship between a provider's teaching profile and its research capability.¹⁰

Collectively, these settings are intended to ensure:

- sufficient breadth and depth of research capability;
- a strong research environment that supports teaching and training; and
- system-wide confidence in the Australian University category.

The requirements in the Threshold Standards also reflect the understanding that a university's research capability contributes to teaching quality, curriculum renewal, academic leadership and opportunities for student engagement in inquiry and research, particularly where research activity is effectively integrated with teaching and learning.

Policy design challenges, tensions and safeguards

The policy design challenge is how regulatory settings can support greater institutional differentiation while ensuring research excellence, capability and sustainability are demonstrated clearly and consistently. Any revised approach would need to balance greater flexibility for universities to pursue research specialisation with clear expectations for research depth, excellence and sustainable capability in nominated fields.

A related issue arises for universities with a specialised focus, which are currently required to demonstrate world-standard research across all FoE in which they self-accredit. Consideration may be needed of how revised criteria would apply to these universities to ensure consistency, proportionality and alignment with the intent of enabling genuine research specialisation.

Changes to research requirements may also affect the range or number of providers capable of meeting the Australian University category criteria, including whether providers that do not currently satisfy the category requirements could become eligible to seek university status. This raises broader questions about system structure, regulatory workload and the clarity of distinctions between the provider categories.

Any reform approach would need clear and robust expectations for research quality, capability and sustainability in nominated fields of research. A key consideration is what constitutes a materially higher requirement in a more specialised model, how this would be evidenced, and whether revised expectations could be applied consistently across institutions with different research

⁸ [Australian and New Zealand Standard Research Classification \(ANZSRC\), 2020 | Australian Bureau of Statistics](#)

⁹ [State of Australian University Research | Home](#)

¹⁰ The codes are used by the Australian Bureau of Statistics (ABS), government agencies, higher education providers and research organisations for the collection, reporting, publication and analysis of higher education, research and innovation data. The classifications support national and international statistical reporting and benchmarking.

profiles. This may require further consideration of appropriate indicators, benchmarks and assessment methodologies.

Universities operate within an interconnected research environment characterised by competition for funding, talent and infrastructure, alongside extensive collaboration between institutions, disciplines and sectors domestically and internationally. Greater research specialisation may create opportunities to strengthen research focus, scale, and collaboration, while also requiring careful management of transition risks as universities adjust research strategies, investment decisions and areas of focus. At a system level, consideration may be needed of how to maintain national capability, resilience and disciplinary coverage in areas of strategic importance.

TEQSA's current guidance recognises that there is no single approach to assessing research quality and draws on measures of research activity and performance, including those in the Tertiary Education Quality and Standards Agency (Quality of Research) Determination 2021 (Determination 2021). The Australian Research Council (ARC) is developing a new Research Insights Capability to support more accessible and actionable understanding of research performance and the research environment. The timing and design of this work will be relevant to whether any changes to the Threshold Standards proceed ahead of, alongside, or after revised national research evaluation approaches are settled.

Defining research depth and breadth

A shift towards specialisation raises questions about what constitutes “depth” of research capability and how it should be defined and measured. Relevant considerations may include scale and concentration, sustainability over time, critical mass of research activity, research-active staff, infrastructure, research training, partnerships, governance, and demonstrated outputs and impact.

Teaching, learning and student experience

Current requirements link research expectations with research training, academic governance and the institutional research environment. A more specialised model may strengthen the depth and sustainability of research activity in selected areas of institutional focus, but also raises questions about how scholarship, academic leadership and curriculum renewal would be supported across a university's broader teaching profile.

Universities would need to consider how students continue to access contemporary disciplinary expertise, research-informed curricula, honours pathways, higher degree by research supervision, and opportunities to participate in research activity. These issues may be particularly important for regional universities and their local communities, where changes to research capability could affect local ecosystems, postgraduate pathways, industry engagement and workforce development.

Minimum disciplinary spread

The SERD Report recommends retaining a minimum number of FoRs while reducing overall disciplinary breadth. A key design question is whether the minimum should be expressed only as a number of 4-digit FoRs, or whether additional requirements are needed to ensure sufficient disciplinary spread, university resilience and system value.

Requiring a minimum number of 4-digit FoRs may support greater focus but could also permit institutions to meet the requirement through combinations of research fields that are technically compliant yet too narrow to demonstrate a coherent or sustainable research profile. Consideration

may therefore be needed on the minimum level of disciplinary spread required to support academic ecosystems, cross-disciplinary engagement and university adaptability over time.

At a system level, concentration of university research effort may affect the breadth and distribution of research capability across disciplines. While some disciplines may be more likely to attract focused institutional investment than others, maintaining a diverse and resilient research system depends on a range of factors beyond individual institutional decisions, including student demand, research funding, workforce movements, international collaborations and broader government policy settings.

Voluntary uptake and higher expectations

The SERD Report proposes voluntary uptake, allowing universities to align any move toward specialisation with their mission, strategy and local context. While a voluntary model supports institutional autonomy, it may create uneven sector-wide uptake, concentration in some fields, gaps in national capability, or strategic behaviour focused on threshold compliance rather than long-term sustainability. Where institutions elect to pursue a narrower research profile, expectations for research excellence would need to be meaningfully higher than those currently applied. This would help ensure reduced breadth is justified by depth, quality and sustainability, rather than a narrow recalibration toward minimum compliance.

Interaction with funding and incentives

Changes to research requirements may interact with funding frameworks, institutional investment decisions and broader strategic and operational settings in different ways across universities and prospective university category applicants. A key consideration is how regulatory settings may interact with research investment and risk management.

Regulatory and implementation impacts

A move toward narrower FoR-based research assessment would require alignment between TEQSA, the ARC and other relevant parts of the research evaluation system to ensure assessment approaches, benchmarks and evidence are aligned and fit for purpose. Consideration would also need to be given to the availability, timeliness and consistency of data used to assess research quality, capability and impact. Amendments to the Threshold Standards may also require arrangements to determine whether existing providers continue to meet revised criteria. This raises questions about reassessment, transitional arrangements, regulatory burden and whether existing providers should be deemed to continue meeting the category standard for a defined period while revised evidence requirements are phased in.

Transition and timing

Current transitional arrangements under the Threshold Standards recognise the long lead times required to build research capability, including strategy, staffing, culture, infrastructure, governance and measurable outputs. Any further reform would need to account for providers already operating within these pathways, including investments and organisational changes already underway. Transition arrangements would need to balance regulatory stability and fairness for providers with timely implementation of reforms intended to support greater focus, scale and impact in the research system.

International comparison

International experience shows that higher education systems can support differentiated institutional missions while maintaining quality assurance, public confidence and system coherence.

European reforms under the Bologna Process¹¹ have emphasised transparency, comparability and institutional diversity, while Germany's Excellence Strategy¹² supports research performance and institutional profiling through targeted funding and collaboration. In the United States, the Carnegie Classification framework¹³ distinguishes institutions by mission, degree profile and research intensity, enabling research concentration in some universities alongside diverse teaching and research missions across the system.

These examples suggest that differentiated research missions can be compatible with strong research quality, governance and public accountability, provided regulatory and funding settings clearly distinguish between institutional mission, research intensity, quality assurance and university status.

They also indicate that greater differentiation can create challenges for system coordination, disciplinary coverage, student mobility and equitable access to research opportunities, requiring ongoing stewardship, monitoring and policy oversight.

This is consistent with the Coaldrake Review of the Higher Education Provider Category Standards¹⁴, which highlighted the value of a more differentiated higher education system and recognised that institutions may pursue different missions, strengths and areas of excellence. The review emphasised the importance of ensuring that provider category standards remain fit for purpose, support innovation and diversity, and continue to uphold public confidence in the university title.

In this context, research specialisation should not be viewed as lowering expectations for research performance. Rather, the focus is how research excellence, capability and impact can be demonstrated through different institutional models while maintaining confidence in university status.

Concluding considerations

Current breadth-based research requirements have supported a shared understanding of university-level research capability, research-informed teaching and institutional maturity. At the same time, the SERD Report and the Accord Report identify opportunities for a more differentiated system. If amendments to regulatory settings are required, they need to support specialisation while managing risks to quality, scholarship, student experience, disciplinary capability and system confidence.

Feedback provided through this submission will contribute to ATEC's advice to the Minister on whether existing regulatory settings appropriately support research excellence, institutional differentiation and productivity objectives, including whether amendments to the Higher Education Standards Framework (Threshold Standards) may be necessary to support greater research

¹¹ [The Bologna Process and the European Higher Education Area \(European Commission\)](#)

¹² [Excellence Strategy | DFG](#)

¹³ [Carnegie Classification of Institutions of Higher Education](#)

¹⁴ [What's in a Name? Review of the Higher Education Provider Category Standards Final Report October 2019 Emeritus Professor Peter Coaldrake AO](#)

specialisation. To support your consideration of these issues, a series of consultation questions is provided below.

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

Submissions are due Monday 7 September 2026 to HESFconsultation@atec.gov.au