

September 4, 2025

ACGR response to request for feedback: Draft Higher Education Support (Commonwealth Scholarships) Guidelines 2025 and legislative amendments to the Other Grants Guidelines (Research) 2017 (OGG)

The Australian Council of Graduate Research (ACGR) acknowledges the work of the government in revisions of the Draft Higher Education Support (Commonwealth Scholarships) Guidelines 2025 and legislative amendments to the Other Grants Guidelines (Research) 2017 (OGG). The ACGR support the removal of restrictions on work hours, the clarification on leave entitlements, the inclusion of leave on the basis of gender-related violence and more clarity on the eligibility of industry internships. However, we do feel that updating these terms is an opportunity to provide further revision to support the development of quality researcher training and development within Australia. We shall outline our concerns and suggestions below.

Higher Degree by Research (HDR) working hours provisions

The ACGR welcome the removal of restrictions on work hours which we believe will be of benefit to Higher Degree by Research (HDR) candidates and facilitate industry engagement. While positive, we also appreciate that this change is an implicit acknowledgement that candidates are required to work whilst undertaking their PhD to reach an acceptable standard of living due to the low level of the Research Training Program (RTP) stipend rate.

The ACGR, in collaboration with Universities Australia, has previously indicated that the base value of the RTP stipend rate is a disincentive to participation for PhD candidates, particularly domestic students. While removing a limit on work hours may help candidates to earn additional funds to support themselves, increased work hours is likely to compromise candidate progression and timely completion. Hence, removing the work hours requirement should not be a substitute for providing an RTP stipend that supports a reasonable standard of living. In conjunction with that, we reiterate our support for an

increase in the minimum stipend to meet a realistic cost-of-living benchmark, with indexing to maintain this standard put forward in our [Investing in PhD Candidates in Australia](#) report.

An important consideration in the removal of work hours is the risk that candidates may attempt to engage in high or even full-time work while attempting to maintain full-time study. In this situation, universities will engage with candidates, encouraging them to enrol in part-time study to better reflect the time they are able to spend on their PhD. However, the fact that part-time scholarships are taxed is a disincentive to candidates enrolling part-time. As such, we recommend that taxation be removed on part-time stipend scholarships.

Parental leave provisions

The ACGR support the rights of Australian HDR candidates to receive paid parental leave and note that the 12 weeks paid parental leave in these guidelines is lower than the governments paid parental leave. We believe that HDR candidates should be entitled to a period of leave that aligns with the government paid parental scheme. Further, while we understand that HDR candidates are not technically employees and that they receive a stipend rather than a wage, we reiterate our recommendation that HDR candidates should be entitled to the governments paid parental leave scheme like other working Australians when they hold a full-time RTP stipend. We believe that this would represent an important equity measure to ensure that parents are not disadvantaged by higher levels of education.

Industry internship RTP weighting

We appreciate the clarification that the government has provided regarding the eligibility of PhD industry internships. The ACGR has recently undertaken a survey of Higher Education Providers in relation to the timing of internships within the sector. Across the 44 institutions that responded to our survey, they reported a combined total of approximately 1,259 Internships undertaken in 2024. Of those only 709 (56%) Internships were eligible for the RTP weighting, with the remainder being ineligible because they were not agreed early in the candidature.

ACGR maintains the position that research internships are typically of most value to the industry host and the HDR candidate when undertaken at an advanced stage of candidature, once the HDR candidate has developed a range of research skills of value to the research end-user. Often the value proposition is not evident in the first 18 months as the research project itself and the HDR candidate's research skills are insufficiently

developed to properly plan and commit to a meaningful experience for both the candidate and the industry partner.

This position is also consistent with data provided to us by Australian Postgraduate Research Intern (APR.Intern), Australia's only national PhD and Masters by Research internship program spanning all sectors and disciplines, reporting that of the 1108 internships they have supported since 2007, only 139 (12.5%) have been executed within the first 18 months of candidature. Despite this, satisfaction ratings of over 97% have been achieved for candidates, their supervisors and the industry partner. Importantly, 21% of internships resulted in industry employment for the HDR candidate, bringing research skills and capability directly to industry from the University and benefitting candidates in the process.

International student RTP cap

ACGR is disappointed that there was no change to the international student cap for RTP funding, which has been maintained at 10%. We have previously argued for an increase in the international student cap to 20% to reflect the declining domestic cohort of PhD students and shortage of PhD applicants in particular areas, such as Engineering. We reiterate that recommendation which would allow Universities more flexibility.

Use of RTP funds to support industry co-funded stipends

ACGR suggest the inclusion of provisions for more flexibility in allowing RTP stipends to be partially supported by an industry partner. For example, this could involve models of PhD scholarships where 50% of funding is supported by RTP and 50% of funding supported by an industry partner. Such a model would facilitate an increased industry investment in research, grow meaningful engagement with research end-users in line with the government's priorities, and allow Universities to further grow research training capacity. At present a HEP must allocate candidates 100% of the minimum base RTP stipend rate and any industry partner contribution must be in addition to this allocation.