

September 2, 2026

ACGR Response to ATEC Review of Research Requirements: 'Australian University Category'

The Australian Council of Graduate Research (ACGR) welcomes the opportunity to provide feedback on the Australian Tertiary Education Commission's (ATEC) consultation on the research requirements for the Australian University category.

ACGR is the national peak body for graduate research in Australia's higher education sector. All universities accredited by TEQSA to deliver research training programs are members of the ACGR, represented by Deans of Graduate Research and equivalent leaders from Australian universities offering Higher Degree by Research (HDR) programs. Founded in 1997, ACGR plays a leading role in promoting excellence in research and research training nationally and in positioning graduate research as a key contributor to Australia's future prosperity.

The ACGR supports the objective of strengthening research excellence, impact and productivity across the Australian higher education system. However, we emphasise that any move towards research specialisation must preserve the defining characteristics of a university, including the capacity to undertake research and provide high-quality researcher training. It should also recognise the important relationship between research and teaching, the contribution of interdisciplinary research, and the particular role universities play in regional and local communities.

Maintaining research training as a defining characteristic of a university

The ACGR strongly supports retaining research training as an essential characteristic of the Australian University category. This is consistent with the consultation paper, which itself recognises that a university must have a research environment that supports research training, supervision and academic leadership. It also identifies research training capability as an important component of the sustained investment required for internationally competitive research performance.

This principle should be retained and reinforced in any revised regulatory framework. The capacity to provide research training, including higher degree by research programs, is fundamental to the identity and societal value of a university.

Research training is not only an outcome of research capability, but is critical to the maintenance and future development of Australia's research capability and workforce. Universities provide an environment in which future researchers develop their capabilities, engage with contemporary research and contribute to the development of knowledge. Engaging in research training allows universities to grow the next generation of the Australian research workforce, whilst simultaneously creating and growing overall research capability.

The ACGR therefore recommends that any revised categorisation of Australian Universities continue to require all institutions to demonstrate a sustainable research environment capable of supporting research training and supervision. Any reduction in requirements for research breadth should not result in a reduction in the expectation that universities undertake research training.

Protecting the teaching–research nexus

The consultation paper appropriately recognises that research capability contributes to teaching quality, curriculum renewal, academic leadership and opportunities for students to engage in inquiry and research. It also acknowledges the need to ensure that students continue to have access to contemporary disciplinary expertise, research-informed curricula, honours pathways, higher degree by research supervision and opportunities to participate in research activity.

The ACGR considers the relationship between teaching and research to be central to the university model.

Greater research specialisation should not inadvertently create universities in which substantial areas of undergraduate teaching are disconnected from an active research environment. Students must engage with research through their undergraduate education. This is particularly important in the context of national efforts to strengthen the domestic research pipeline and increase participation in higher degree research.

The teaching–research nexus should therefore be an explicit consideration in the design and assessment of any specialised research model. Research specialisation should strengthen, rather than weaken, the capacity of universities to provide research-informed teaching and to inspire students to pursue research careers.

Interdisciplinary research and the breadth of university capability

The ACGR is concerned that a narrow interpretation of research specialisation could inadvertently undermine interdisciplinary research.

Many of Australia's most significant research challenges, including climate change, technological transformation, health, sustainability and social equity, cannot be addressed effectively within disciplinary boundaries. Research excellence and impact increasingly depends upon collaboration across disciplines and the integration of different forms of expertise and evidence.

The consultation paper recognises the importance of cross-disciplinary engagement and notes that minimum disciplinary spread may be necessary to support academic ecosystems and university adaptability. Although it is recognised, this consideration should be given greater prominence in any revised framework. In particular, research specialisation should not result in universities removing entire disciplines that may appear peripheral to a nominated research strength but are essential to interdisciplinary research and research translation.

For example, technological innovation does not occur independently of the humanities, arts and social sciences (HASS). The development of new technologies is important, but their adoption depends upon understanding people, communities, institutions, culture, policy, ethics and behaviour. HASS research and expertise are therefore integral to the translation and societal impact of the research undertaken in science, technology, engineering and related fields.

A regulatory model that encourages universities to progressively remove HASS capability in pursuit of a narrower research profile could consequently undermine, rather than enhance, research impact and excellence. The ACGR therefore recommends that any specialised model explicitly recognise the contribution of interdisciplinary capability to research excellence to ensure that their research profile will support interdisciplinary research.

Implications for students and equitable access to research opportunities

The ACGR is also concerned about the potential implications of specialisation for student opportunity and access to research training.

The consultation paper appropriately identifies student opportunity and equitable access as issues requiring consideration, particularly for regional universities and their communities.

A more specialised university system could force students to relocate in order to access research training in particular disciplines. This would have significant consequences for

students who are unable to relocate because of family or caring responsibilities, financial circumstances, employment or other constraints. Such consequences will disproportionately impact already disadvantaged cohorts of students that the government has prioritised as an important target for increased participation in tertiary education.

Regional universities are particularly important in this context. Their role should not be assessed solely through the scale or concentration of research undertaken on campus. Regional institutions support students and communities across broad geographical areas, including through online and distributed models of education and research training. There also needs to be recognition that the research needs of regional communities are complex and diverse, requiring not a range of disciplinary and interdisciplinary expertise, but also a research workforce that understands the particularity of regional economic/social/cultural systems.

Narrowing the types of research that regional institutions have the opportunity to conduct and/or offer research training in will impoverish regional communities because either (a) those communities will not be able to access the expertise needed to solve problems/leverage opportunities and/or (b) that expertise will sit with people who do not have lived experience of regional communities, and therefore cannot hope to apply their knowledge in a relevant way.

The ACGR therefore recommends that the impacts of specialisation on equitable access to undergraduate education, honours and higher degree by research opportunities be explicitly assessed before any changes to the Threshold Standards are implemented.

Regional capability and the relationship between research and teaching

The proposed reforms should also recognise the relationship between research capability and teaching quality in regional Australia.

A university's research profile contributes to the academic environment in which teaching takes place. If institutions were encouraged to specialise their research activity too narrowly, there is a risk that disciplines outside the nominated areas of research strength could experience declining research capability and reduced access to research-active academic staff. This could ultimately affect the quality and currency of teaching in those disciplines.

The issue is particularly important for regional universities, where the university may be a major source of disciplinary expertise, professional education, research capability, workforce development and community engagement. A decision to specialise in a limited number of research fields could have consequences well beyond research performance,

including for the breadth and quality of educational opportunities available to local and regional communities.

The ACGR therefore supports maintaining sufficient disciplinary breadth to sustain healthy academic ecosystems and research-informed teaching, while allowing institutions appropriate flexibility to develop areas of particular research strength.

The purpose and evidence base for reform

The consultation paper states that its purpose is not to test whether research specialisation should occur, but rather to consider how potential reform might be designed, sequenced and implemented. The ACGR considers that this creates an important limitation to the consultation.

Before determining the appropriate regulatory settings, a clearer articulation of the problem that research specialisation is intended to solve would be helpful. The potential benefits of greater concentration of research capability need to be weighed carefully against the risks of reduced disciplinary breadth, diminished interdisciplinary capability, constrained student choice, reduced regional access and fragmentation of the national research and training pipeline.

If greater flexibility for research specialisation is pursued, the ACGR supports the consultation paper's position that reduced breadth should be accompanied by genuinely higher expectations for research depth, quality, capability and sustainability. It remains unclear whether these expectations would be achieved simply with compliance to a lower specified number of Fields of Research.

The consultation paper itself acknowledges the risk that institutions could meet a minimum numerical requirement through combinations of fields that are technically compliant but too narrow to constitute a coherent or sustainable research profile.

Assessment should therefore consider the broader research ecosystem, including:

- the scale and sustainability of research activity;
- research-active academic staff and academic leadership;
- research infrastructure and capability;
- research training and supervision capacity;
- research integrity and research governance;
- interdisciplinary research capability;
- research partnerships and collaboration;
- demonstrated research quality, impact and translation; and

- the relationship between research activity and teaching and learning.

In particular, research training should be treated as an essential component of research depth and sustainability, rather than simply one indicator among many.

Conclusion

The ACGR supports a higher education system in which universities can build areas of distinctive research strength and achieve greater scale, impact and international recognition. However, research specialisation should not come at the expense of the characteristics that distinguish a university or the broader purposes of the university sector.

Any reform should retain the principle that an Australian University is a research and research-training institution. It should preserve the teaching–research nexus, support interdisciplinary research, maintain appropriate disciplinary breadth, and protect equitable access to education and research training, including in regional Australia.

The ACGR therefore recommends that any amendments to the Threshold Standards:

1. retain research training as a core requirement of the Australian University category;
2. require universities to demonstrate sustainable capacity for higher degree research training and supervision;
3. recognise interdisciplinary capability as an essential component of research excellence and impact;
4. protect the teaching–research nexus and students’ exposure to research throughout their university education;
5. consider the implications of specialisation for student access, mobility and equity, particularly for regional and disadvantaged students;
6. maintain sufficient disciplinary breadth to support interdisciplinary research, research-informed teaching and resilient academic ecosystems; and
7. ensure that any reduction in research breadth is matched by demonstrably higher expectations for research depth, quality, sustainability and research training.

The ACGR considers that these safeguards would allow Australia to pursue the legitimate benefits of research concentration and institutional differentiation while maintaining the integrity of the Australian University category and the strength of the national research training pipeline.