

Submission to the
Australian Tertiary
Education
Commission

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THE UNIVERSITY OF
MELBOURNE

Review of Research Requirements: 'Australian University Category'

Executive Summary

The University of Melbourne welcomes the opportunity to contribute to the ATEC's Review of Research Requirements for the 'Australian University Category'.

Australia's universities make an essential contribution to the nation's research and innovation effort, conducting nearly 80% of the country's public sector research and around 36% of total R&D. Over 90% of university research outputs are rated at or above world standard. A vibrant research and innovation sector is an essential sovereign capability for Australia in a world defined by fracturing globalisation, geopolitical rivalry and escalating technological change.

In light of recommendations by the Strategic Examination of Research and Development (SERD) Panel for greater research specialisation, it is timely to consider whether existing regulatory settings, including the Higher Education Standards Framework (Threshold Standards), appropriately support research excellence, institutional differentiation, sovereign capability and productivity objectives.

The SERD Report, *Ambitious Australia*, recommended an implementation pathway to enable institutional research specialisation that would revise the Provider Category Standards to enable universities with the flexibility to undertake excellent research in 3 or more 4-digit Fields of Research. It would remove the breadth requirement to undertake research at world standard for 50% of the fields a university teaches in. The SERD Panel was mindful of the need to maintain an appropriate research threshold for university status while supporting universities to use resources more efficiently to build scale in areas of competitive and comparative advantage.

On balance, the University believes that the potential benefits of reform could outweigh the risks but further time and evidence is needed to fully interrogate the proposals. The University recommends reforms to:

- Remove the research breadth requirements, aligned with the proposal for reform in the SERD Report, and retain institutional autonomy in deciding research profiles.
- Retain TEQSA's existing standards on research and set standards to genuinely incentivise research depth and teaching quality.
- Retain safeguards for the use of the title 'university'.
- Consider the impact of new measures on student choice.
- Adopt oversight, incentives and funding measures to ensure research in national priority areas is not diminished.
- Address research funding sustainability including the Accord and SERD recommendations for funding the full costs of research, research training and research infrastructure, to complement the research specialisation reform and provide genuine incentives for institutions to specialise.
- Retain regulatory oversight whilst avoiding unnecessary administrative burden on providers.

With these conditions in place, removing the research breadth requirements has the potential to deliver a more differentiated, high-quality and sustainable higher education research system that advances the *Ambitious Australia* vision.

The University looks forward to working with ATEC and with Government as this important reform consultation continues.

For further information or to discuss this submission Professor Mark Cassidy, Deputy Vice-Chancellor (Research) can be contacted on dvc-research@unimelb.edu.au.

Enabling a more effective university sector

The University has long argued that Australia should move to a tertiary education ecosystem which is more varied. Such a system would enable distinct teaching-intensive, research-intensive and vocational institutions with students able to move among these options seamlessly. To date, relatively few Australian universities have chosen to adopt specialised institutional models, preferring a comprehensive model.

In 2008, the University of Melbourne transitioned to a pedagogy model distinctive in the Australian higher education sector (the [Melbourne Curriculum](#)) but aligned in structure and philosophy with leading universities in Europe and the United States. The University plays a vital role in providing diversity and choice to the sector by offering a small number of broad undergraduate degrees and delivering all its professional education at the postgraduate level. This means the University has one of the broadest suites of graduate programs in the sector, and approximately 50% of our students are postgraduates, reflecting our model as a comprehensive and research-intensive university.

UoM undergraduate education requires students to study one-quarter of their subjects outside of their 'home' faculty, so that they are exposed to diverse disciplines and perspectives at this formative phase of their higher education journey. Simultaneously, by choosing one of more than 100 majors, they acquire deep disciplinary knowledge, enriched by its proximity to cutting-edge research and researchers. The intent is to foster greater breadth of knowledge, interdisciplinary mindsets, and analytical and adaptive capabilities in graduates in a changing world.

Our graduate programs provide a rigorous and focused professional education for students who often have some level of professional experience to draw on. They also provide career-change education to mature professionals – a crucial capability as the Australian economy evolves and will need different professional capabilities which require upskilling and reskilling over a working life.

While there is no evidence offered to support the proposals in the discussion paper, in theory universities could gain the flexibility needed to meaningfully differentiate and concentrate their offerings. Meaningful specialisation however will also require complementary reforms, including addressing the full costs of research, the current incentives that encourage comprehensive institutions, and the reliance on international education revenue to cross-subsidise the nation's research effort.

The University remains of the view that an essential attribute of a university is research and research-informed teaching, so regulations to protect this attribute are appropriate. The Threshold Standards 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.

The University agrees with the discussion paper's position that a specialised approach would need to be accompanied by higher expectations regarding research quality, capability and sustainability in the nominated fields of research. However, these regulations should not be so inflexible as to prevent universities from directing research resources in ways which maximise their unique capabilities and best meet community needs.

Also fundamental to any reform is retaining institutional autonomy to decide research and teaching offerings and that any move towards research specialisation should be voluntary and aligned with institutional mission, soon to be supported by Mission-based Compacts.

The change proposed in Ambitious Australia

The University welcomed the recommendation in the Strategic Examination of Research & Development (SERD) report, *Ambitious Australia*, on university research specialisation. *Ambitious Australia* represents a compelling and long-overdue vision for transforming Australia into a high-growth, innovation-driven economy.

However, reform to enable greater university specialisation is just one component of the integrated nation-building package delivered by the SERD Panel.

The University agrees that the Provider Category Standards, and in particular the research breadth requirements for Australian Universities, contribute to universities taking an unnecessarily homogenous approach, resulting in a majority of broad-based, comprehensive universities. While there is diversity already present amongst Australia's universities in terms of research scale and quality, Australia's university sector is also characterised by system homogeneity in terms of research and teaching profiles. In comparison, the United States, with a diverse and well-regarded tertiary education system, does not have a single accrediting body for universities. Instead, there is the [Carnegie Classification](#) which is essentially a national taxonomy of [31 Institutional categories](#).

The 2025 Carnegie system no longer uses research activity as part of the basic institutional classification. Instead, there is a separate [Research Activity Designation](#). It uses just two measures: total R&D expenditure, from the [NSF HERD survey](#); and the number of research doctorates awarded, from federal [IPEDS data](#). Using these measures, institutions are separated into three groups: Research 1 (Colleges & Universities with more than \$50 million on R&D and 70 PhDs), Research 2 (more than \$5 million on R&D and 20 PhDs), and Research 3 (more than \$2.5 million on R&D with no doctoral requirement).

Ambitious Australia's recommendation, to reduce the condition for research breadth and enable each university to build scale in areas of their competitive and comparative advantage, is one approach to more efficiently using scarce resources and boosting the impact of Australia's university research output. This would result in requiring universities to undertake excellent research in 3 or more 4-digit fields of research while removing the requirement to undertake research at world standard for 50% of the fields they teach in.

This approach would maintain the link between the university definition and research, and has the potential to lead to a more differentiated, high-quality and sustainable higher education research system that advances the *Ambitious Australia* vision. Resolving the approach to the anticipated research infrastructure roadmap and properly funding research infrastructure is a key element in efficiently deploying scarce resources in an area where these resources are shared across providers and with industry.

If implemented carefully, this would also constitute a modest but meaningful reduction in regulatory burden and support for university autonomy. This development would be particularly welcome given the prevailing trend towards ever-greater regulation of the sector and cuts to research funding — a trend that has imposed cumulative financial costs whilst progressively narrowing the space in which institutions are free to operate, innovate and uplift the nation's sovereign capabilities.

While changes to the Provider Category Standards could enable diversification, broader reforms are also required that will make that a viable and attractive choice for institutions including addressing funding for the full costs of research, funding for teaching that covers the costs of delivery (especially in high cost fields), supporting the research training system and permanently establishing a funded research infrastructure fund.

ATEC's current examination of the costing and pricing of higher education will be fundamental to this review of research specialisation.

Designing reform and mitigating risks

While supportive of reform, the University acknowledges that risks attend any redesign of the current framework. Accordingly, the University welcomes the ATEC's careful consideration of how prospective reforms might be designed, sequenced, and implemented. The consultation paper sets out the range of opportunities but also the challenges that would come with enabling more research specialisation. For this reason, any reform should not be rushed and close consultation with providers should continue. The Compact discussions can also inform this discussion as ATEC builds a deeper understanding of provider research missions.

Teaching and Research Quality

There are risks that reform results in lower teaching and learning quality by removing the requirement that universities undertake research at world standard for 50% of the fields they teach in. The Threshold Standards require universities to support a teaching-research nexus, which would also need to be considered.

With the less demanding requirement for research breadth, new providers may seek to gain the reputational benefits associated with university status by directing resources towards satisfying the research standards, to the detriment of investment in teaching quality and the broader student learning experience. The creation of multiple new 'universities' able to offer a variety of self-accredited, but potentially lower-quality, courses across a broad range of areas would not be a desirable outcome. The consultation paper correctly flags that consideration may also be needed on the minimum level of disciplinary spread required to support academic ecosystems, cross-disciplinary engagement and university adaptability over time.

Threshold Standards in other domains could be part of a framework that ensures quality in teaching and research. The University notes advice to the ATEC by Professor Liz Johnson on enhancing professional practice in Australian higher education teaching, made public on 18 August 2026. The advice includes various recommendations including an amendment of the Threshold Standards to introduce a new standard for teaching practice, a new clause requiring teaching within specific disciplines to be informed by discipline-based educational research and practice, and a revised standard for staffing qualifications with supporting amendments in governance.

Should new requirements be put in place, assessment methodologies should not impose significant new data collection and administrative requirements on universities. The provision that the quality of research is to be measured 'using best practice indicators,' as currently set out in the Threshold Standards should be maintained, with assessment data drawn from existing data collection sources. Existing enforcement approaches including periodic re-registration, risk-based monitoring and targeted regulatory action are appropriate and should be maintained.

As noted in the ATEC discussion paper, the Australian Research Council (ARC) is developing a new Research Insights Capability to support a more accessible and actionable understanding of research performance and the research environment. This work should inform how university research is measured under any changed requirements in the Threshold Standards.

Research and the national interest

The consultation paper correctly identifies that enabling research specialisation may result in uneven sector-wide uptake, concentration in some fields, gaps in national capability, or strategic behaviour focused on threshold compliance rather than long-term sustainability.

The fundamental principle of institutional autonomy and academic freedom that determines research mission must not be undermined by any proposed reforms to research requirements for universities. The issues identified by the consultation paper can be addressed by properly funding the full costs of research, funding

for teaching that covers the costs of delivery and permanently establishing a research infrastructure fund. The high costs of research in some areas of national priority can influence research priorities for universities. These issues cannot be addressed in isolation but as a coherent system-wide whole to secure a research effort that delivers for the national interest and does not inadvertently curtail emerging fields.

Australia's university sector reputation

The Australian higher education system's global reputation for high standards is important to Australian universities' ability to attract international students, research talent and global funding and to sustain public confidence in the higher education system. Reforms that are poorly communicated risk generating a perception that the overall quality of the sector is being diminished. Australia could consider adapting or developing a classification framework modelled on overseas examples such as the Carnegie Classification, which could provide important information about universities to students, employers, government and community.

Ambitious Australia recommendations could also make an important contribution to the reputation of Australian universities. A sector that is closely connected to Government, industry, investors and the wider community, and that consistently translates research into innovation, commercial opportunities and impact, is one that will command a strong reputation.

Student choice

Australian students tend not to move for university to the extent that they do so in some other comparable countries. In Professor Andrew Norton's publication [Mapping Australian Higher Education 2023](#), he notes Census data from 2021 showing that 85% of Australian 18-year-old university students live with a close relative, suggesting most study in their hometowns. A more varied tertiary education system, with some universities specialising their research focus, could reduce student choice, particularly for regional and rural students, if their preference is to study closer to home.

Research-teaching nexus

There are also disadvantages associated with the separation of research and teaching activities. It is well established that high-quality teaching can be delivered by educators who are not themselves active researchers in the relevant discipline. This is demonstrated by the performance of numerous well-regarded institutions and systems internationally. The teaching-focused campuses of the California State University system, which operate alongside the research-intensive University of California campuses, is a notable example.

At the same time, research in a discipline can enable innovative curriculum models which may not otherwise be possible. Students also gain through exposure to leading researchers, research-informed curricula and opportunities for honours pathways and higher degree by research supervision.

For providers that decide to be more teaching-intensive, innovative partnerships could provide engagement with research-intensive activity. For example, formal partnerships with research-intensive universities or publicly funded research agencies could be established with providers adopting a teaching-intensive model. Visiting researcher programs could expose students to active disciplinary research without requiring the host provider to sustain that research independently.

On balance, the University believes there could be potential benefits of reform, as long as the identified risks are addressed, further time is provided to consult with the sector and evidence to support the reform is identified.

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