INDEPENDENT HIGHER EDUCATION AUSTRALIA

IHEA SUBMISSION

ATEC REVIEW OF RESEARCH REQUIREMENTS: 'AUSTRALIAN UNIVERSITY CATEGORY' HIGHER EDUCATION STANDARDS FRAMEWORK (THRESHOLD STANDARDS)

7 September 2026

IHEA Submission

Australian Tertiary Education Commission Review of Research Requirements: 'Australian University Category' in the Higher Education Standards Framework (Threshold Standards)

Independent Higher Education Australia (IHEA) welcomes the opportunity to respond to the Australian Tertiary Education Commission (ATEC) Review of Research Requirements: 'Australian University Category' in the Higher Education Standards Framework (Threshold Standards), for which submissions are due by 7 September 2026.

Introduction

IHEA represents Australia's five private universities — Australian University of Theology, Avondale University, Bond University, Torrens University and University of Divinity — as well as six University Colleges — ACAP University College, Australian University College of Divinity, Alphacrucis University College, Excelsia University College, Moore Theological College and SAE University College — and 80 independent higher education providers.

These institutions make a vital contribution to Australia's higher education and research ecosystem. They operate, however, under materially different funding, scale and structural conditions from the large, research–intensive Table A universities, which benefit from substantial public research funding, extensive research infrastructure and much larger research workforces.

IHEA strongly supports the policy objective of enabling greater research specialisation and institutional differentiation, as articulated in Recommendation 37.f.ii of the Australian Universities Accord Final Report and the 2025 Strategic Examination of Research Development (SERD). The ATEC review provides an important opportunity to ensure that Australia's regulatory framework recognises diverse university missions rather than treating research intensity, research breadth and university status as synonymous.

The central principle should be that the 'Australian University' category establishes a credible minimum threshold for university–level research capability and quality without prescribing a single comprehensive model. A university should be able to demonstrate research excellence, capability and sustainability through a focused research profile without being required to replicate the breadth, scale, research workforce or infrastructure of a large research–intensive university.

IHEA therefore supports reform of Part B1.3 of the Threshold Standards to provide a more proportionate and coherent framework for research requirements. In particular, IHEA recommends:

- Reforming criterion B1.3.16(a) by replacing the current "whichever is greater" test with a requirement to demonstrate benchmark research in the lesser of three broad Fields of Education or 50 per cent of the broad Fields of Education in which the provider delivers courses.
- Reforming criterion B1.3.16(b) so that a university with a specialised focus is required to demonstrate benchmark research in at least one broad field or 50 per cent of the broad fields in which it has self–accrediting authority, whichever is greater, rather than in every such field.
- Harmonising the research requirements for entry to and ongoing maintenance of the 'Australian University' category.
- Ensuring that research quality is not conflated with research intensity, absolute research income, workforce size, infrastructure scale or publication volume.
- Ensuring that regulatory expectations are proportionate to institutional mission, research profile, scale and maturity.

These reforms would maintain confidence in the Australian University category while removing unnecessary barriers to genuine research specialisation and institutional differentiation.

Core Principles

- **A common threshold, not a single institutional model:** The 'Australian University' category should establish a clear minimum threshold for university–level research capability and quality. It should not prescribe the characteristics of a comprehensive, research–intensive university as the model against which all institutions are assessed.
- **Specialisation should be available across the sector:** The opportunity to pursue a specialised research profile should be available to Australian universities and aspiring entrants across the sector, including smaller private universities and specialised institutions.
- **Research quality must be distinguished from research intensity:** The Threshold Standards should distinguish between the minimum research capability required for university status and the substantially greater research intensity that may be appropriate for institutions pursuing particular research missions or benefiting from significant public research investment.
- **Regulation should be proportionate:** Research requirements should recognise differences in institutional mission, research profile, scale, maturity and funding. Smaller or specialised universities should be able to demonstrate high–quality research without being required to replicate the absolute research income, staffing, infrastructure or output volumes of large research–intensive universities.
- **Specialisation should not create a new regulatory tier:** A specialised model should not simply replace breadth requirements with equally onerous requirements for research depth, scale, infrastructure, funding or performance. The purpose of reform should be genuine differentiation and flexibility, not a new form of research intensity test.

Key Structural Flaws in the Current Threshold Standards

Reforming the research breadth requirement — B1.3.16(a)

The current criterion B1.3.16(a) requires research at benchmark level in at least three, or at least 50 per cent, of the broad fields of education in which the provider delivers courses, whichever is greater.

The absolute three field floor creates disproportionate outcomes for smaller, focused institutions.

For example, a provider delivering courses in three broad fields must demonstrate benchmark research across all three fields. A provider delivering courses in six broad fields must demonstrate research in three fields. Consequently, an institution with a much narrower academic profile can face a substantially greater proportional burden.

This can create a perverse incentive for providers to expand their teaching breadth simply to satisfy a regulatory research requirement, rather than investing resources in depth and excellence in their areas of strength. As such, we support replacing the current 'whichever is greater' formulation with a requirement to demonstrate benchmark research in the lesser of three broad Fields of Education or 50 per cent of the broad Fields of Education in which the provider delivers courses.

This would preserve a rigorous breadth requirement while ensuring that the burden is proportionate to the provider's actual academic profile.

It is worth noting that further clarification will be required as to how fractional results are treated where the number of broad Fields of Education is odd. For example, 50 per cent of three or five broad fields produces 1.5 or 2.5 fields. The final drafting should specify how the requirement is to be calculated and rounded, as rounding up or down could materially affect the number of fields in which benchmark research must be demonstrated. IHEA considers this an important matter for further consultation before the revised standard is finalised.

A disproportionate penalty on specialised universities — B1.3.16(b)

The current treatment of specialised universities creates a significant regulatory anomaly. Under criterion B1.3.16(b), a university with a specialised focus must undertake benchmark research in all broad (2–digit) fields of education in which it has authority to self–accredit. This can result in a substantially greater research burden than applies to a non–specialised university.

For example, a specialised university with self–accrediting authority in two broad fields may be required to demonstrate benchmark research in both fields — effectively 100 per cent of its self–accrediting fields. By contrast, a comprehensive university operating across a much larger number of broad fields is subject to the proportional test.

This is inconsistent with genuine research specialisation. A university may deliberately choose to concentrate research capability in a limited number of areas and may have no intention of becoming a comprehensive university. Its research obligations should therefore not increase simply because of the breadth of its teaching or self–accrediting authority.

The current approach can also discourage interdisciplinary teaching and research. A university may offer a field of study to support its core research mission without intending that field to become a major independent research strength. Regulation should not require it to establish world–standard research in every field merely because it teaches or self–accredits in that field.

We therefore recommend that B1.3.16(b) be amended to require benchmark research in at least one broad field, or at least 50 per cent of the broad fields in which the university has authority to self–accredit, whichever is greater.

This would retain a meaningful research threshold while removing the current requirement to demonstrate benchmark research across every self—accrediting field.

Entry and maintenance requirements should be harmonised

The current regulatory architecture creates a distinction between the research requirements applying on entry to the ‘Australian University’ category and those applying to established Australian Universities.

Criterion B1.3.17 currently provides a separate 30 per cent research requirement while an institution works towards the standard in B1.3.16. This creates an unnecessarily complex and potentially inequitable framework, particularly for smaller aspiring universities.

IHEA considers that entry and maintenance should be based on a single coherent threshold.

If an institution has the governance, academic capability, research training capacity and research quality necessary to satisfy the Australian University threshold, it should not face a separate and potentially more onerous research test simply because it is seeking entry to the category.

A harmonised standard would:

- Remove unnecessary regulatory double standards
- Provide aspiring universities with a clear and stable target.
- Reduce the risk that smaller entrants face disproportionately high requirements.
- Simplify TEQSA assessment.
- Avoid the paradox whereby a small provider can face a higher proportional research burden on entry than an established university faces in maintaining its status.

IHEA therefore recommends that the substantive research threshold for initial entry and ongoing maintenance be aligned, supported by an appropriate implementation pathway of a reasonable period where an aspiring provider requires time to reach the standard.

Research Specialisation Should Support Genuine Institutional Differentiation

IHEA strongly supports ATEC's recognition that existing breadth–based requirements can encourage universities to spread research investment across fields rather than develop depth and critical mass in areas of strength.

However, specialisation should not simply replace one uniform regulatory model with another.

There is a fundamental difference between a university choosing to specialise and a university choosing to become research–intensive. Specialisation means concentrating research capability and investment in selected fields. It should not mean that a smaller private university must demonstrate the scale of research income, research infrastructure, staffing, doctoral training or research outputs that may reasonably be expected of a large research–intensive Table A university.

The regulatory framework should therefore distinguish between research excellence and research intensity.

A university should be able to demonstrate excellent research within its nominated fields without being required to match the absolute scale of institutions whose missions, funding and research ecosystems are substantially different.

Public Funding and Regulatory Expectations

Research–intensive universities with substantial public research funding, large research workforces, extensive research infrastructure and significant access to competitive research funding operate with a very different capacity to sustain broad and deep research activity from private universities that are substantially reliant on tuition revenue.

This does not justify lower standards of research quality. It does, however, support proportionate regulation.

The Threshold Standards should establish whether an institution has sufficient research capability and sustainability to meet the university threshold and deliver its stated research mission. They should not become a mechanism for requiring all universities to converge on the characteristics of the most research–intensive Table A institutions.

Research income, workforce size, infrastructure scale, publication volume and doctoral enrolments may all provide relevant evidence of research capability. They should, however, be considered in context and should not operate as de facto mandatory minimum thresholds.

Research Quality Should Remain High

The benchmark standards in B1.3.19 provide an appropriate foundation for assessing whether research demonstrates world–standard performance using appropriate indicators or, where conventional indicators are unsuitable, national standing in fields specific to Australia. However, it would be helpful for there to be greater clarification of the mechanisms for assessing world standard.

Changes to research breadth requirements should not be treated as a lowering of the research standard. Research quality should remain distinct from research intensity, with research income, staffing, outputs and doctoral activity considered as evidence of capability and sustainability rather than as uniform proxies for quality.

TEQSA should assess whether an institution has sufficient capability and sustainability to deliver its stated research mission, taking account of its mission, scale and research profile, rather than requiring it to replicate the characteristics of a large research–intensive university.

Conclusion

IHEA supports the objective of enabling greater research specialisation and institutional differentiation. The

review provides an opportunity to establish a proportionate research framework for the 'Australian University' category that maintains a credible university level quality threshold while recognising that research excellence can be achieved through different institutional models.

IHEA proposes to retain a meaningful research breadth requirement while replacing the current 'whichever is greater' formulation in B1.3.16(a). The requirement should be the lesser of three broad Fields of Education or 50 per cent of the provider's broad Fields of Education. This would reduce the disproportionate effect of the current formula on smaller and more focused providers without removing research breadth.

For specialised universities, B1.3.16(b) should require benchmark research in at least one broad field, or 50 per cent of the broad Fields of Education in which the university has authority to self-accredit, whichever is greater. A specialised university should not be required to establish benchmark research in every self-accrediting field merely because it teaches or self-accredits in that field. This would retain a meaningful research expectation while allowing a specialised university to concentrate research capability in fields aligned with its mission and strengths.

These changes would provide greater flexibility without lowering research quality. The existing B1.3.19 benchmarks should remain. Research income, staffing, infrastructure, doctoral activity and publication volume should inform the assessment of capability and sustainability but should not become uniform minimum thresholds that equate research scale with research quality. The reforms should therefore be understood as proportionate differentiation rather than a reduction in research standards.

In addition, entry and ongoing requirements should be aligned, with appropriate transitional arrangements and protection against retrospective increases in regulatory burden for existing universities and providers already progressing towards university status.

The consultation paper provides a basis for considering greater specialisation, but the detailed regulatory model and drafting have not yet been developed. IHEA therefore considers further consultation essential before changes are finalised, including on the evidence required, how different research profiles would be assessed by TEQSA, and how fractional results under the proposed, reformed 50 per cent test would be calculated and rounded.

A well designed framework can maintain confidence in the 'Australian University' category while supporting genuine research specialisation and institutional diversity. The objective should be a clear and credible research quality threshold that allows universities to demonstrate capability and sustainability through research profiles that reflect their missions, strengths, scale and circumstances.

Who We Are

Independent Higher Education Australia Ltd. (IHEA) is a peak body established in 2001 to represent Australian independent (private sector) higher education institutions. Our membership spans independent universities, university colleges and other institutes of higher education, all of which are registered higher education providers accredited by the national higher education regulator, TEQSA or associate members seeking registration.

There is a long tradition of independent higher education providers in Australia, with the first provider created as early as 1815, only 27 years after the first British settlement in Sydney in 1788. In total, five providers were established between 1815 and 1845 and preceding the first public university. The fifth of these was St James College, which was created in 1845. The founders of St James College were then involved in creating Moore College in 1856 and remarkably Moore College, a University College, still exists and is Australia's longest continuously operating independent higher education provider.

Our Vision is that: students, domestic and international, have open and equitable access to world class independent higher education in Australia, built on the foundations of equity, choice and diversity.

Our Mission is to represent independent higher education and promote recognition and respect of independent providers as they contribute to Australian education, the Australian economy and to society in general. We achieve this by promoting continuous improvement of academic and quality standards within member institutions, by advocating equity for their staff and students and by delivering services that further strengthen independent providers' reputations as innovative, sustainable and responsive to the needs of industry and other relevant stakeholders in both higher education and vocational education and training. IHEA's commitment is to excellence, productivity and growth in independent higher education being delivered through a trusted Australian education system underpinned by equity, choice and diversity.

IHEA members have different missions, scales and course offerings across the full AQF range (Diplomas to Doctorates). IHEA has 94 members, which rises to over 120 if providers' constituent colleges and subsidiaries are included.

IHEA's 94 members comprise:

- Five private Universities (Australian University of Theology, Avondale University, Bond University, Torrens University and University of Divinity).
- Six University Colleges (ACAP University College, Australian University College of Divinity, Alphacrucis University College, Excelsia University College, Moore Theological College and SAE University College).
- Eighty not–for–profit and for–profit institutions of higher education (which includes twelve full or partially self–accrediting institutes); and related corporate entities.
- Three corporate owners of higher education providers.

IHEA members teach approximately 74 percent of the students in the independent sector (i.e., more than 140,000 students) and educate students in a range of disciplines, including law, agricultural science, architecture, business, accounting, tourism and hospitality, education, health sciences, theology, creative arts, information technology, human services and social sciences.

IHEA holds a unique position in higher education as a representative peak body of higher education providers. Membership in IHEA is only open to providers registered, or seeking registration, with the Australian regulator – TEQSA. However, some IHEA members are dual and multi–ϖsector providers who also deliver VET and/or English Language Intensive Courses for Overseas Students (ELICOS) courses.

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IHEA Member Institutions

Universities

- Australian University of Theology
- Avondale University
- Bond University
- Torrens University Australia
- University of Divinity

University Colleges

- ACAP University College
- Alphacrucis University College
- Australian University College of Divinity
- Excelsia University College
- Moore Theological College
- SAE University College

Institutes of Higher Education

- Academies Australasia Polytechnic
- Academy of Interactive Technology
- Acknowledge Education
- Adelaide Central School of Art
- AIBI Higher Education
- AIM Business School
- Australasian Academy of Higher Education
- Australasian College of Health and Wellness
- Australian Chiropractic College
- Australian College of Christian Studies
- Australian College of Nursing
- The Australian College of Physical Education
- Australian Data and Cyber Institute
- The Australian Institute of Music
- Barton Business School
- Campion College Australia
- Central Institute of Technology and Innovation
- Christian Heritage College
- CIHE Australia
- COLLARTS
- The College of Law
- Eastern College Australia
- Education Centre of Australia
  - Asia Pacific International College
  - ECA College of Health Sciences
  - Higher Education Leadership Institute
- Endeavour College of Natural Health
- EQUALS International
- Fairmont College Australia
- Gateway Business College
- Governance Institute of Australia
- Holmes Institute
- IBC Education
- iCareers Institute
- ICHM
- Ikon Institute of Australia
- International College of Management, Sydney
- International School of Global Leaders
- JMC Academy
- Kaplan Business School
- Kaplan Higher Education
- King's Own Institute
- Laurus Higher Education
- LCI Melbourne
- Le Cordon Bleu Australia
- Leaders Institute
- Lyons College
- Marcus Oldham College
- MIECAT
- Morling College
- Nan Tien Institute
- National Institute of Organisation Dynamics Australia
- Navitas
  - Curtin College
  - Edith Cowan College
  - Eynesbury College
  - Deakin College
  - La Trobe College Australia
  - Griffith College
  - SAIBT
  - SIBT
  - Western Sydney University International College
- Nova Higher Education
- Ozford Institute of Higher Education
- Photography Studies College
- Polytechnic Institute Australia
- Russo Business School
- Sheridan Institute of Higher Education
- Skyline Higher Education Australia
- S P Jain School of Global Management
- Stanley College
- Sydney Institute of Higher Education
- Sydney International School of Technology and Commerce
- Sydney Met
- Southern Academy of Higher Education
- Tabor College
- The Tax Institute Higher Education
- Torrens University Australia
  - Think: Colleges
- Universal Business School Sydney
- Universal Higher Education
- UoW College
- UTS College
- Wentworth Institute

Economic contribution of independent higher education

IHEA INDEPENDENT HIGHER EDUCATION AUSTRALIA

NineSquared

Key Findings.

Independent higher education is an important contributor to Australia's economic activity.

The sector contributes

$8.2 billion

to Australia's GDP

196,000 students

61% International*

39% Domestic*

*Shares based on EFTSL

For every **$3** the sector directly contributes to GDP, it supports around **$1** of additional value added elsewhere in the economy

Contributes

$3.0 billion

in government tax revenue

International students contribute

$7.6 billion

to Australia's GDP

Increases output by

$14.0 billion

Supports

18,906 FTEs

across the economy

Contributes

$13.1 billion

to total incomes

The sector contributes to the Australian economy through several major impact channels:

- institutional spending
- international student living expenses
- expenditure of visiting friends and family
- net increase in student labour supply
- graduate labour productivity uplift
- research driven productivity uplift