

Submission to HESC Consultation on Research Security ATN Universities

7 September 2026

KEY MESSAGES FROM ATN UNIVERSITIES

1. Government cannot yet tell universities what compliance looks like, and no amendment to the Threshold Standards will fix that problem.
2. A central Commonwealth research security advisory function, on the model the paper itself describes, is the measure most likely to improve security outcomes.

Research security is a critical national security issue which requires joined-up oversight from Commonwealth agencies to support productivity, resilience and fairness

3. The Australian Technology Network of Universities represents Australia's most applied, industry-connected universities: Curtin University, Deakin University, the University of Newcastle, RMIT University and the University of Technology Sydney. Our members carry a high volume of industry, SME and international research engagement. ATN seeks to test the Higher Education Standards Committee's (HESC) consultation on research security according to our three advocacy pillars: productivity, resilience and fairness.
4. ATN Universities agree that a strong research security framework is a key part of maintaining Australia's national security. The security case is not in dispute. Foreign interference in Australian research is real, the Government's concern is legitimate, and ATN member universities have invested accordingly under the University Foreign Interference Taskforce (UFIT) guidelines, the ARC Research Security Framework and their own due diligence and cyber programs.
5. HESC correctly identifies that the research security policy issue is currently busy with numerous instruments and reform processes. It is more appropriate to pursue this national security goal through national security agencies that are following a coordinated framework.
6. A new Part A expectation in the Higher Education Standards (HES) Framework could complicate ongoing processes like the UFIT refresh, the new TEQSA regulatory risk framework and the announced TEQSA powers legislation. The HES Framework already requires that providers have governance processes that effectively assure the provider follows applicable laws and obligations. It would be lower risk and higher impact for the Committee to look for gaps in existing academic governance oversight of research security.

Addressing the need for nationally coordinated guidance on research security requirements is important to strengthen Australia's resilience

7. ATN Universities works to strengthen Australia's ability to resist shocks under our *Resilience* advocacy pillar. This includes Australia's ability to identify and mitigate risks to national security and the wellbeing of Australians. Making sure that Australian researchers are not creating security vulnerabilities through their collaboration with colleagues offshore is an essential part of that.
8. The consultation paper identifies the problem as inconsistent guidance and unclear government expectations. That is a statement about the coherence of Commonwealth advice, not about institutional capability or willingness. Existing architecture includes approximately twenty instruments across Defence,

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DFAT, Home Affairs, Treasury, ASIO, the Attorney-General's Department, DISR, Education and the ARC. Adding a additional instrument, separately enforceable, does not resolve inconsistency between the existing set.

9. ATN member universities report that no agency can currently state what standardised compliance looks like, that requirements compete with one another, and that “proportionate” is used across frameworks without definition. Work that universities do to estimate proportionality is guesswork, and is wasted when the estimate turns out to be wrong.

Recommendation 1

10. ATN Universities recommends that the HESC support a Commonwealth coordination measure rather than a new section of the HES Framework, and should review any gaps in existing academic governance oversight. For example, “research security” could be included as an objective which governing processes need to assure via Standard 6.2.1 (Corporate Monitoring) or Standard 6.3.2 (Academic Oversight).

For the Commonwealth to be assured that universities are putting in place adequate protections in support of national resilience, the Commonwealth needs to determine what ‘adequate’ looks like

11. Assurance is limited by the absence of a definable compliance target, not by institutional capability. ATN member universities have implemented UFIT guidelines, established research security governance, and invested in due diligence, export control and cyber capability. Implementing these enhanced protections has demanded an increased allocation of staff time and resourcing; a ninefold increase from 2021 to 2024 at one ATN member.
12. What members cannot do is establish whether that investment satisfies government. There is no single benchmark, and obligations arising under different frameworks are not always reconcilable. For example, disclosure expectations under the ARC Research Security Framework, sit awkwardly against privacy obligations owed to staff. There are overlapping and contradictory expectations separately communicated under Australian and United Nations Security Council sanctions as enacted by the Foreign Minister, the warning against certain formal arrangements under the Foreign Arrangements Scheme, and the Department’s new expectation for zero informal collaboration between researchers in Australia and any researchers in specific countries.
13. The proposed duty to ensure staff, research students and affiliated researchers are informed, equipped and protected is supportable in principle. It is dischargeable in practice only where the underlying obligations are stable and knowable. Expectations that are not authoritatively defined and that change without notice cannot be trained against, and an institution cannot equip a researcher to comply with a requirement that government has not yet decided.
14. A central Commonwealth advisory function would improve research security outcomes more than a new enforceable duty would and is critical to bridge the gap between universities and various relevant government bodies and frameworks.
15. The paper describes the United Kingdom's Research Collaboration Advice Team and Canada's Research Security Centre approvingly. Both provide what ATN Universities considers is missing: a single, authoritative, resourced point of advice that removes the need for every institution to interpret the threat environment independently for each agency that is active in research security.
16. Establishing that function is a precondition for answering the Threshold Standards question well, rather than being an alternative to answering it. A standard drafted on top of settled, published guidance is enforceable in a way that a standard drafted in its absence is not.

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TEQSA is not enabled to take regulatory action on research security; its role in supporting national resilience needs to be heavily deferential to national security agencies who hold the actual threat intelligence

17. TEQSA assesses regulatory risk, while research security risk is assessed from threat intelligence TEQSA does not hold. TEQSA is a quality and standards regulator. It has no classified intelligence access, no clearance-based assessment function, and no statutory role in the counter foreign interference architecture occupied by Home Affairs, ASIO, DFAT and Defence. The paper concedes that institutions vary in their capability to identify covert interference risk and to assess complex ownership and control structures. That constraint applies with greater force to a regulator with less exposure to the underlying activity than institutions have.
18. Obligations relating to foreign interference, foreign arrangements, export controls, sanctions and cyber security already exist and are already enforceable, under portfolios that hold the underlying evidence base. A Threshold Standards expectation would create an additional reading of the same conduct, administered by an agency that does not hold the evidence. This is not likely to result in better national security outcomes.
19. Containing TEQSA's regulation of this issue to assurance that corporate and academic governance processes are fulfilling their responsibilities in relation to research security (under existing obligations to assure compliance with other laws and regulations) would mitigate this.

Recommendation 2

20. TEQSA should scope its regulatory activity relating to research security matters to assessment of the corporate and academic governance processes which assure compliance with applicable laws.

Research security experts from ATN members can work with the Department on identifying where coordination would be most impactful

21. ATN Universities can offer direct evidence to inform future regulatory reform:
 - 21.1. Our members operate at the intersection of research and industry at scale. Their experience of research security compliance is the experience of applying frameworks designed for formal international partnerships to a much larger volume of applied, domestic and SME engagement. That evidence is not otherwise well represented in this consultation.
 - 21.2. We are willing to work with HESC and the Department to demonstrate where Commonwealth coordination is most needed to support national security. ATN Universities offers to provide HESC and the Department with de-identified worked examples of conflicting, undefined or unworkable requirements to inform drafting. There are a complex set of legal and security considerations in this space; because of the nature of these issues, it's appropriate to engage at that level directly with HESC and outside the public submission process.

We would welcome an opportunity to discuss these issues further.

Further enquiries should be addressed to:

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