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Department of Home Affairs
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Submission to the *Consultation on proposed amendments to streamline and modernise the Security of Critical Infrastructure Act 2018*

To whom it may concern,

Universities Australia (UA) welcomes the opportunity to respond to the Department of Home Affairs' consultation on proposed amendments to the *Security of Critical Infrastructure Act 2018*. Our members are committed to protecting our research, people and institutions from physical and cyber-threats. UA is broadly supportive of the proposed amendments, provided the resulting obligations are proportionate, clearly defined and designed to complement, rather than duplicate, existing research security and compliance frameworks.

UA supports the submission made by the Australasian Higher Education Cybersecurity Service (AHECS). The proposed three-part model is sensible, but it should be accompanied by clear definitions, thresholds and practical guidance to support consistent interpretation and implementation across the university sector. As AHECS notes, universities differ significantly from defence and government agencies in their structures, purposes and operating environments. Risk management and institutional oversight are therefore likely to be more practical and effective than prescriptive controls applied at the level of individual researchers or projects.

The amendments should also avoid creating unnecessary compliance burdens that divert university resources from identifying and managing genuine national security risks. Universities are already subject to a range of research security, foreign interference, export control and cybersecurity requirements. Any additional SOCI obligations should integrate with these arrangements and avoid overlapping or inconsistent reporting, assurance and risk-management requirements.

UA would welcome further engagement with the Department as the Rules are developed. This should include detailed consultation with the sector on the definition of prescribed sensitive research fields and the thresholds used to determine which activities and institutions fall within the SOCI framework.

Yours sincerely



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