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**researchintegrity@usq.edu.au**

Australian Sanctions

Risk assessment and compliance form

**Overview:**

[Australian sanction laws](https://www.dfat.gov.au/international-relations/security/sanctions/about-sanctions) implement United Nations Security Council (UNSC) sanctions regimes and Australian autonomous sanctions regimes. The following diagram taken from the DFAT website (Accessed: 24/05/2022) shows the currently implemented sanctions regimes under Australian Sanctions laws. There are also quick reference guides for each of these sanctions’ regimes available from the DFAT website: <https://www.dfat.gov.au/international-relations/security/sanctions/about-sanctions> .



**When to use this form:**

Use this form to undertake a risk assessment for international students, employees, and visitors who are not Australian citizens (or Permanent Residents) and who may be subject to international sanctions. This review should be undertaken early in the relevant processes and prior to offers of enrolment for students, offers of employment, or offers of appointment to visiting academics/adjunct persons, and again if any variation to the research project occurs. This completion of this form allows the University to take a risk-based approach in its compliance with Australian Sanctions laws.

Additionally, there are a range of sanctions that may impact on other activities at UniSQ:

* Formal or informal research collaborations (whether funded or not) with academics or organisations if the academics or organisations are not Australian citizens (or Permanent Residents) and are subject to international sanctions.
* Technology or material transfers to sanctioned countries or individuals.
* Consultancies or engagement in private practice for or with sanctioned countries or individuals.
* Entry into or transit through Australia of a 'designated person' or a 'declared person'.

**The importance of due diligence:**

An absence of due diligence in conducting proper checks before undertaking any of these activities in breach of an underlying sanction attracts severe penalties, including substantial fines and jail sentences. Please note sanctions regimes can be subject to frequent and significant change by the Australian Government. If you are regularly undertaking tasks of this nature, you should subscribe to the Australian Sanctions Update service available at: <http://dfat.gov.au/international-relations/security/sanctions/Pages/outreach.aspx> to ensure that you are made aware of new sanctions, as they are applied.

**How to complete this form:**

* Parts A & B – To be completed by the relevant area proposing the arrangement/project (e.g., GRS for new students)
* Part C, D & E – The proposed supervisor to complete
* Part F – Relevant delegate endorsement
* Part G & H (only to be complete if required) – Manager, Research Integrity and Ethics & DVC (R&I)

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| **A. Application Details - To be completed by the relevant area (e.g., People Portfolio, GRS)** |
| 1. Name of person:
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| 1. Person Type (e.g., prospective staff member, prospective HDR student):
 |  |
| 1. Student or Staff ID (if applicable):
 |  |
| 1. Citizenship:
 |  |
| 1. Name/s of proposed supervisors:
 |  |
| 1. Host department (e.g., School of Creative Arts)
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| 1. Has the person declared that they are receiving financial support from an institution/ government located in a sanctioned country? (If yes, provide relevant details of the scholarship, fellowship, or other financial support)
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| **B. Prohibited persons and entities check - To be completed by the relevant area (e.g., People Portfolio, GRS)** |
| The Department of Foreign Affairs and Trade (DFAT) keeps the Consolidated List, a list of all persons and entities who are subject to targeted financial sanctions or travel bans under Australian sanctions laws. To appropriately address Questions 8-11 below:* Obtain and attach relevant information to this form (e.g., CV, letters from the applicant)
* Access and search the consolidated List (using CONTROL-F): <http://www.dfat.gov.au/sanctions/consolidated-list.html>

**Example of using the form:**If the form is being completed for a prospective student, search their name (and any variations), the name of their sponsor or referees, the name of the institution where they have obtained their qualifying degree, any funding body associated to the student’s project, and recent employment relationships. This should all be information in their application and provided resume. |

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| *Does the arrangement &/or project involve?* | *Check if YES* | *Provide further details of the search terms and results* |
| 1. A prohibited person/entity (as per the consolidated list)?
 | [ ]  |  |
| 1. A person who had or has a relationship or affiliation with a prohibited person or entity (e.g., a relative that appears on the list, a previous employee)?
 | [ ]  |  |
| 1. An arrangement/project that may involve a potential benefit to a Prohibited Person or Entity?
 | [ ]  |  |
| 1. A person or entity that received funding from a Prohibited Person or Entity
 | [ ]  |  |

**🖐STOP:**

**If you have ticked ‘YES’ to any question in Part B above (Question 8-11), you have flagged a MEDIUM or HIGH Risk associated with this person. Please seek advice from the Manager, Research Integrity and Ethics before progressing this form.**

Before starting Section C, please ensure that you have reviewed the relevant information on the previous pages and please ask for any information that you know has been recorded in Parts A & B incorrectly to be updated.

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| **C. Project overview - To be completed by the main supervisor** |
| 1. Title of Proposed research project/s and/or arrangement at UniSQ (e.g., position title if new employee):
 |  |
| 1. Where will the research be conducted (e.g., Toowoomba Campus in P10)
 |  |
| 1. Does the proposed project and/or arrangement involve or require any external organisations (i.e., in terms of funding, IP, research collaboration, deliverables, etc)?
 | Yes [ ]  | No [ ]  |
| * 1. If yes, please provide details:
 |  |
| 1. Will the person/entity be working on a research project?
 | Yes [ ]  | No [ ]  |

Please only complete Section D below if you ticked ‘YES’ above to question 15. If you ticked ‘NO’ and this is for a person who will **not be** involved in research (e.g., a professional staff position), please continue to Section E.

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| **D. Research Project Details- To be completed by the main supervisor** |
| 1. Research project description:
 |  |
| [**Sanctions**](https://www.legislation.gov.au/Details/F2021L01198) **Regimes - Considerations** |
| Some regimes listed on the DFAT website have additional considerations related to goods and services (e.g., Russia, Iran, Syria). Check the citizenship at question 4 and review the sanctions regime for that country considering the proposed research project.Sanctions regimes can be accessed here: <https://www.dfat.gov.au/international-relations/security/sanctions/about-sanctions> Example:* Student is a citizen from Iran
* The proposed research project is an Engineering project, and the person will be working in a lab with graphene.
* Check: <https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/iran-sanctions-regime>
* The guidance indicates: *“It is prohibited to supply, sell or transfer to Iran (directly or indirectly) any of the following goods: certain kinds of graphite, raw metals, semi-finished metals, and software for integrating industrial processes”.*
* This flags that there may be a risk related to sanctions.
 |
| 1. Does the project raise any concerns for you in relation to sanctions measures after reviewing the relevant sanctions regime?
 | Yes [ ]  | No [ ]  |
| * 1. If yes, this project may be MEDIUM or HIGH risk. Please provide details:
 |  |
| [**Defence and Strategic Goods List 2021 (legislation.gov.au)**](https://www.legislation.gov.au/Details/F2021L01198) **- Considerations** |
| 1. Does the project involve use of development of or training/ technical advice in the use, development or maintenance of any of these “arms or related material”? **Tick any that apply**

Please refer to the DSGL for further information [Defence and Strategic Goods List (DSGL) 2021 (legislation.gov.au)](https://www.legislation.gov.au/Details/F2021L01198).  | Weapons, ammunition, military vehicles and equipment | [ ]  |
| Any spare parts or accessories for weapons, ammunition, military vehicles and equipment | [ ]  |
| Paramilitary or law enforcement equipment (e.g., body armour, anti-riot gear, restraints etc). | [ ]  |
| * 1. If yes, this project may be MEDIUM or HIGH risk. Please provide details:
 |  |
| 1. Will the research project provide training in, or lead to, improvements to the use, manufacture or maintenance of any other sanctioned goods listed on the DSGL?
 | Yes [ ]  | No [ ]  |
| * 1. If yes, this project may be MEDIUM or HIGH risk. Please provide details, including advice around whether the project constitutes pure/basic, research or applied research:
 |  |
| 1. Does the research project provide any direct or indirect access to any sanctioned goods? (i.e., consider if there are other research projects in the same lab that use goods that would are sanctioned goods)
 | Yes [ ]  | No [ ]  |
| * 1. If yes, this project may be MEDIUM or HIGH risk. Please provide details:
 |  |
| 1. Does the research project involve dual use goods listed under any of the broad categories in Part 2 of the DSGL? <https://www.legislation.gov.au/Details/F2021L01198>
 | Yes [ ]  | No [ ]  |
| * 1. If yes, this project may be MEDIUM or HIGH risk. Please provide details:
 |  |

🖐**STOP:**

* **If you have ticked ‘YES’ to any question in Part D above (Question 17, 18, 19, 20, 21), you have flagged a MEDIUM or HIGH Risk with this project. Refer to Appendix 1 for the University’s sanctions risk matrix and contact the Manager, Research Integrity and Ethics before proceeding further.**

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| **E. Declaration - To be completed by the main supervisor** |
| I **declare** that all information provided on this form (Sections A-D) is true and correct to the best of my knowledge and belief.I **understand**: * Providing false information in this form resulting in a breach of Australians Sanctions law could result in serious penalties for me and/or the University of Southern Queensland; and
* Any proposed change in the research topic or change to the project/arrangement (impacting status, requirements or research environment) that may affect compliance with the Australian Autonomous or United Nations Sanctions Regime will be reported to the Manager, Research Integrity and Ethics and the Deputy Vice-Chancellor (Research and Innovation) for further review and consideration.
 |
| **Supervisor** | Name  |  |
| Signature |  | Date |  |

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| **F. Endorsement of the delegated authority declaration and signature- To be completed by Category 3 Delegate within the relevant area (e.g., If a research student, send to Dean, GRS)** |
| I **declare** that I have reviewed the information provided in this form and I am satisfied that the risk rating determined for this person and project/arrangement proposed is appropriate to the best of my knowledge and belief and the arrangement/project should proceed with this person’s involvement. I **understand**: * Providing false information in this form resulting in a breach of Australians Sanctions law could result in serious penalties for me and/or the University of Southern Queensland; and
* Any proposed change in the research topic or change to the project/arrangement (impacting status, requirements or research environment) that may affect compliance with the Australian Autonomous or United Nations Sanctions Regime will be reported to the Manager, Research Integrity and Ethics and the Deputy Vice-Chancellor (Research and Innovation) for further review and consideration.
 |
| **Delegated authority** | Name  |  |
| Role |  |
| Signature |  | Date |  |

🖐**STOP:**

* **If there is a a MEDIUM or HIGH Risk with this project, you must send this form to the Manager, Research Integrity and Ethics before proceeding with this project/arrangement. The Manager will complete Part F and send the form onto the DVC (Research and Innovation) for review and approval.**

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| **G. Review – To be completed by the Manager, Research Integrity and Ethics if a MEDIUM or HIGH Risk has been identified above.** |
| Following a review of this form, please provide advice around the risk and what risk mitigation strategies should be put in place for this agreement to continue (incl. whether an inquiry or permit request must be lodged in relation to export controls and/or sanctions for this arrangement to continue)  |
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| **H. Approval - To be completed by the Deputy Vice-Chancellor (Research and Innovation)** |
| With respect to compliance with Australian Sanctions law, the University of Southern Queensland: |

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| Approves the arrangement/project to continue  | [ ]  |
| Does not approve the arrangement/project due to the identified risks | [ ]  |

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| **Deputy Vice-Chancellor (Research and Innovation.** | Name  |  |
| Signature |  | Date |  |

## APPENDIX 1: Risk Matrix

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| --- | --- | --- |
| Ranking | Recommended Outcome/s based on risk rating – Proposed control activities to address the risk | Mitigation Steps |
| **Low Risk:** No aspect of the research proposed to be conducted involves supply of sanctioned technology or services to the student/ Employee/ adjunct/visitor and the proposed research involves no access to high risk equipment and materials, no access to DSGL items or technologies, and no access to technologies that are related in any manner to weapons of mass destruction. | 1. Acceptance of the application, subject to satisfaction of all other requirements of the University/approval of the research, subject to satisfaction of all other requirements of the University
 |  |
| **Medium Risk:** It is unlikely that any aspect of the research proposed to be conducted involves supply of sanctioned technology or services to the student and the proposed research might be managed in a manner that involves no possibility of access to high risk equipment and materials, no possibility of access to DSGL items or technologies, and no access to technologies that are related in any manner to weapons of mass destruction. | 1. Acceptance of the research, subject to satisfaction of all other requirements of the University;
2. Request modification of the research proposal to lower risk rating and then re-assess the application;
3. Reject the application on the grounds that it exposes the university to unacceptable risk
4. Request further details and reassess the application in light of those details; OR
5. Refer the application/proposal to DFAT through the Online Sanctions Administration System for permitting consideration and then accept the application, subject to satisfaction of all other requirements of the University (if a permit is granted) or refuse the application on the grounds that it exposes the university to unacceptable risk of Australian Sanctions (if a permit is not granted).
 |  |
| **High Risk:** There is some prospect that an aspect or aspects of the research proposed to be conducted might involve supply of sanctioned technology or services to the student or the proposed research might involve access to high risk equipment and materials or access to DSGL items or technologies, or technologies that are related to weapons of mass destruction. | 1. Request modification of the research proposal to lower risk rating and then re-assess the application;
2. Reject the application on the grounds that it exposes the university to unacceptable risk of Australian Sanctions; OR
3. Refer the application to DFAT through the Online Sanctions Administration System for permitting consideration and then accept the application, subject to satisfaction of all other requirements of the University (if a permit is granted) or refuse the application on the grounds that it exposes the university to unacceptable risk of Australian Sanctions (if a permit is not granted).
 |  |