

Foreign Interference Management Framework

Section 1 - Purpose and Scope

- (1) The University Foreign Interference Policy outlines expectations and requirements regarding the management and mitigation of foreign interference risks. This Framework outlines the University's processes for governing and managing foreign interference risk in alignment with the Foreign Interference Policy.

Section 2 - Principles and Key Requirements

Governance

- (2) The Foreign Interference and Disclosure and Management of Interests Taskforce (FIDMIT) is the accountable authority for the security of the University Community and protection of University Information and Assets from foreign interference
- (3) FIDMIT responsibilities include, but are not limited to:
 - a. developing, reviewing and overseeing the University of Queensland Foreign Interference Framework
 - b. developing and reviewing policy and procedures that set out the responsibilities and expected conduct for all those engaging in University business to manage foreign interference risk
 - c. overseeing risk and reporting frameworks
 - d. developing and maintaining the Foreign Interference Risk Assessment Tool
 - e. overseeing the implementation and recording of proportionate mitigation strategies
 - f. coordinating responses to suspected Foreign Interference events in connection with University Activity
 - g. reviewing and communicating UQ security risks and mitigations to University colleagues, government and sector counterparts through appropriate mechanisms
 - h. overseeing foreign arrangements, collaborations and funding
 - i. overseeing university responses to reported issues
 - j. facilitating regular briefings on foreign interference risk management and issues to USET and the Vice-Chancellor.
- (4) The Provost is the Chair of FIDMIT and is the Risk Owner of the UQ Foreign Interference risk.
- (5) FIDMIT membership is comprised of UQ Office holders with foreign interference responsibilities in portfolio areas:
 - a. Provost (Chair)
 - b. Deputy Vice-Chancellor (Research and Innovation)
 - c. Pro-Vice-Chancellor (Global Partnerships)
 - d. Pro-Vice-Chancellor (Research)
 - e. Chief Security Officer
 - f. Director, Integrity Unit
 - g. Associate Director Attraction, Rewards and Mobility

- h. Director, Legal Services (Research and Intellectual Property)
 - i. Director, Governance & Risk
 - j. Chief Marketing and Communications Officer
- (6) The Chair of FIDMIT is accountable to the University Senior Executive Team on Foreign Interference matters including, but not limited to:
- a. the management of foreign Interference incidents
 - b. significant policy or procedure or reporting updates, including FIDMIT reports to USET and other committees as appropriate
 - c. serious matters to arise from foreign interference monitoring covering staff appointments, visitors, research grants and contracts, international agreement declarations and visiting delegations, higher degree by research students, DSGL and Sanctions screening and permit activities
 - d. actions taken by FIDMIT to address foreign interference risks which arise in the context of FIDMIT screening activities.

Section 3 - Roles, Responsibilities and Accountabilities

Due diligence, risk assessment and management

Staff due diligence

- (7) Staff are required to at least annually disclose their activities in accordance with the below registers:
- a. [Conflict of Interest Online Disclosure Tool](#) in accordance with the [Conflict of Interest for Members of Staff Procedure](#).
 - b. [Secondary Employment Register](#) in accordance with the [Consultancy, Secondary Employment and Internal Work Policy](#).
 - c. [UQ Sensitive Research Register \(SRR\)](#) in accordance with the [Export Controls and Sanctions Frameworks Procedure](#) which flags activities that are subject to requirements under the [Autonomous Sanctions Act 2011](#) or [Defence Trade Controls Act 2012](#).
 - d. [Foreign Influence Disclosure](#) register in accordance with the [Foreign Influence Transparency Scheme Act 2018 \(FITSA\)](#), which requires individuals and entities to disclose activities that may give rise to registration obligations.
- (8) Staff and Students may escalate foreign interference concerns to their supervisor for advice or through the [UQ complaints website](#).
- (9) The International Safeguards Unit screens SRR declarations and assesses them with respect to requirements under the [Autonomous Sanctions Act 2011](#) and [Defence Trade Controls Act 2012](#). The International Safeguards team are responsible for assisting individuals with export controls enquiries, permit applications and approvals as required, in accordance with the [Export Controls and Sanctions Frameworks Procedure](#), and for escalating matters of concern to the PVCR.

HDR Students due diligence

(10) The Graduate School has implemented local level processes to manage the following:

a. **Applications or changes that trigger legislative assessment requirements**

This includes new HDR applications or changes in research topics or supervisory arrangements that may require assessment under the [Autonomous Sanctions Act 2011](#) or the [Defence Trade Controls Act 2012](#), in accordance with the [Export Controls and Sanctions Frameworks Procedure](#).

- i. The Graduate School seeks advice from the Senior Manager (International Safeguards) to determine whether an assessment under the relevant Acts is required.
- ii. The International Safeguards team provides support to HDR applicants and advisors by facilitating export control enquiries, permit applications, and approvals as required, in accordance with the [Export Controls and Sanctions Frameworks Procedure](#).

b. **Applications or changes that involve potential foreign interference risks**

This includes HDR applications or changes in research topics or supervisory arrangements that may give rise to Foreign Interference (FI) concerns.

- i. The Graduate School uses the FIDMIT Foreign University of Concern List to flag applications with potential FI risks.
- ii. Flagged applications are escalated to the PVCR for assessment using the FIDMIT Risk Assessment Tool.
- iii. The PVCR determines whether risk mitigation is feasible. Where risks are not adequately mitigated, the Pro-Vice-Chancellor (Research) may recommend rejection of the application to the Dean, Graduate School.

Research contracts, consultancies and grants due diligence

(11) The Research Office has local processes to:

- a. Undertake screening of research grant applications at time of submission and initial screening of research contracts, consultancy and grants (at time of award or variation) which have a foreign interference risk based on country of origin of the CI or participation in a talent recruitment program, or which involve a partner or institution on the FIDMIT Foreign University of Concern list.

The Research Office escalates high-risk applications, contracts or engagements to the PVCR for advice. The PVCR assesses applications, contracts or engagements with reference to the FIDMIT Risk Assessment Tool and undertakes mitigating action including advising the Research Office to reject the application/ decline the engagement as appropriate.

- b. The Research Office has local processes which identify research contracts, consultancy and grants which involve a foreign government body or foreign university and which require notification to the Minister for Foreign Affairs in accordance with [Australia's Foreign Relations \(State and Territory Arrangements\) Act 2020](#) and in alignment with the University's [International Agreements Policy](#) and [Procedure](#). The Research Office's processes align with UQ's AFRA frameworks, guided by the Global Partnerships division.

Staff recruitment and appointment and visitor due diligence

- (12) Human Resources has local processes to ensure appropriate due diligence is undertaken before offering employment contracts for paid staff to citizens of countries and regions to which sanctions regimes apply or for which there is a foreign interference risk as assessed against the FIDMIT Risk Assessment tool.

Foreign Interference risks associated with recruitment are escalated to the to the PVCR for assessment of these applications with reference to the FIDMIT Risk Assessment Tool. The PVCR takes appropriate mitigating action including advising the Provost (or Chief Human Resources Officer (CHRO), as appropriate) to reject the appointment.

- (13) In accordance with the Visiting Researchers and Visiting Students Policy, Human Resources has local processes to ensure appropriate due diligence is undertaken before approving Research Students or Researchers as visitors where they come from countries and regions to which sanctions regimes apply or for which there is a foreign interference risk as identified on the FIDMIT Institutions of Concern List.

Authorised Officers escalate foreign interference risks associated with Visiting Academics and Visiting Research Students to the to the PVCR for assessment. The PVCR assesses applications with reference to the FIDMIT Risk Assessment tool. The PVCR takes appropriate mitigation action including advising the DVCRI (or Chief Human Resources Officer, as appropriate) to reject the engagement.

International agreements due diligence

- (14) UQ Global Partnerships has processes to manage international agreement risk assessments and ministerial notifications in alignment with [Australia's Foreign Relations \(State and Territory Arrangements\) Act 2020](#), and in accordance with the University's [International Agreements Policy](#) and [Procedure](#). .
- (15) UQ Global Partnerships has processes to manage foreign interference risks associated with visiting delegations in alignment with the ASIO Managing Foreign Delegations and Officials recommendations.

Section 4 - Monitoring, Review and Assurance

Monitoring and reporting

Staff monitoring and reporting

The PVCR monitors the Conflicts of Interest, Secondary Employment and Sensitive Research registers on quarterly basis. The PVCR utilises the FIDMIT Risk Assessment tools in assessing the level of risk associated with the activity. The PVCR reports high risk matters and mitigation strategies associated with staff secondary employment, research collaborations, sensitive (DSGL related) research activities and sanctions to FIDMIT on quarterly basis through the following reports:

- a. Multi-flag Consolidated Disclosures report
- b. Secondary Employment in Foreign Country Declarations report
- c. International HDR Supervision report
- d. Dual By-line report
- e. International Co-authorship report
- f. Export Controls and Sanctions report
- g. Talent Program Screening report

h. Cyberactivity Monitoring report

- (16) The Deputy Provost monitors disclosures as they arise under the [Foreign Influence Disclosure](#) register and evaluates whether a disclosure gives rise to a requirement to register under [FITSA](#). The Deputy Provost may seek legal advice from UQ's General Counsel (or delegate) and consult with the Chief Human Resources Officer (or delegate) and/or the Provost (if the Deputy Provost considers this is appropriate or necessary).

The Provost reports notifications and registrable activities to FIDMIT on quarterly basis.

HDR student monitoring and reporting

- (17) The Graduate School is responsible for submitting a Sensitive Research Topics – Potential HDR Students Report to the Secretary, FIDMIT, on a quarterly basis.
- (18) The PVCR provides a summary of this report at FIDMIT meetings, outlining any mitigation actions undertaken, including decisions to reject applications on national interest or security grounds.

Research contracts, consultancies and grants monitoring and reporting

- (19) The PVCR reports to FIDMIT meetings on research contracts, consultancies and grants that were escalated and the mitigation actions adopted, including those involving rejection of the partnership/engagement.

Staff recruitment and appointment and visitor monitoring and reporting

- (20) The Associate Director, Attraction, Reward and Mobility provides to the Secretary, FIDMIT on a quarterly basis, a list of staff, visiting researchers and research students that were assessed as a potential foreign interference risk and the appropriate mitigation action taken, including escalation to PVCR for assessment and rejection by the Provost/DVCRI/CHRO of the appointment of visitation.

International agreements monitoring and reporting

- (21) The Pro-Vice-Chancellor (Global Partnerships) is responsible for providing a quarterly report to FIDMIT on international delegations and events managed and coordinated through Global Partnerships, including the names of visitors and their institution of origin, and the names and organisational units of UQ participants.
- (22) The Pro-Vice-Chancellor (Global Partnerships) is responsible for providing a quarterly report to FIDMIT on international agreements which require notification to the Minister for Foreign Affairs in accordance with [Australia's Foreign Relations \(State and Territory Arrangements\) Act 2020](#) and in alignment with the University's [International Agreements Policy](#) and [Procedure](#).

Communication, training and knowledge sharing

- (23) The Vice-Chancellor, Chief Operating Officer and Provost are responsible for sharing Foreign Interference intelligence, as appropriate, with Australian federal, state and territory governments, the Higher Education sector and with sectoral partners
- (24) FIDMIT oversees annual communication and training to support Senior Managers, supervisors, researchers and staff to understand foreign interference risks around their research, including the risk that foreign governments could directly or indirectly fund their research because of military or security applications which are secondary to the apparent purpose of the research.
- (25) In accordance with the [Export Controls and Sanctions Frameworks Procedure](#), The International Safeguards team:

- a. assists individuals with export controls enquiries, permit applications and approvals
- b. provides sanctions advice and responds to enquiries and (where relevant) handles permit applications
- c. supports and conducts sanctions assessments, including seeking review and endorsements from Faculty Associate Deans (Research) and Institute Deputy Directors (Research) where there is elevated risk, and providing a written recommendation and reasoning for that recommendation
- d. monitors the Sensitive Research Register to ensure compliance with export controls and sanctions legislation.
- e. provides training, advice and assistance to the University research community on foreign interference risks and security considerations including for academic staff and research students working in sensitive areas and travelling to high-risk locations

Cyber security and physical security

Cyber security

- (26) The University community shares responsibility for cyber security, including the protection of university information from foreign interference. In accordance with the [Cyber Security Policy](#), UQ staff and contractors are responsible for:
 - a. participating in cyber security training where relevant to their work role
 - b. acting consistently and responsibly to protect the University's information assets by:
 - i. complying with procedures in place to protect information assets
 - ii. incorporating safe cyber security practices into their work
 - iii. reporting risks to IT support.
- (27) The Chief Information Officer is responsible for:
 - a. promoting the importance of cyber security risk management to UQ leadership and staff delivering IT services
 - b. providing adequate resourcing for the management of cyber security risk
 - c. reporting on cyber security risk to the University Senior Management Group and Senate.
- (28) In accordance with the [Cyber Security Policy](#), the Information Technology Policy Risk and Assurance Committee approves cyber security procedures and local operating processes.
- (29) Foreign interference implications (including national security information and commercially significant research results) and legislative compliance are factors considered in the process of establishing the information protection classification for information and data, as required by the [Information Security Classification Procedure](#).
 - a. Information users classify University information when they create, capture, process, store, share and/or dispose of University information in electronic or physical formats.
 - b. Information protection measures to be implemented will be driven by the selected information protection classification. The responsibility for adequate classification rests with the user classifying the information at that point in time.
 - c. Information Stewards are accountable for ensuring that required information protection measures are implemented for their information.

Physical Security

- (30) As per the [Use and Management of UQ Land, Building and Facilities Policy](#), UQ staff, students, invited visitors and the public are not permitted to enter private or restricted UQ Facilities without appropriate authorisation. This includes offices, laboratories, workplaces and other areas where access is prohibited or regulated.
- (31) Organisational Units are responsible for ensuring the operational safety of the spaces they occupy and maintaining and updating allocation of space on [Archibus \(People and Occupancy Module\)](#).
- (32) UQ staff, students, invited visitors and the public are not permitted to enter or use UQ Facilities that are not open to the public or other unauthorised persons, including clinics, research and teaching spaces, laboratories, places containing dangerous, restricted or regulated substances or things, storage areas, meeting rooms, private offices or any other UQ Facilities which are signed to prohibit entry.
- (33) UQ may, from time to time and as circumstances require close, evacuate or lock part or all of any UQ Facilities or prevent any person from accessing or using UQ Facilities, or direct any person to leave UQ Facilities for any lawful reason including where a person, poses a threat to the safety of anyone.

Section 5 - Appendix

Appendix A: FIDMIT Endorsed Risk Assessment Tool

This tool is a guide only and should be adapted for local needs.

It is designed to be used as a guide by staff responsible for screening in central portfolios and senior academic leaders as appropriate (e.g. Heads of School).

WHO: The nature of the partner institution (University or commercial partner)
Disparity in the expertise or capability of the partner compared with UQ researchers
The partner is listed on the FIDMIT Institutions of Concern List
Unclear or opaque activities, dubious or unverifiable online footprint
The partner is linked to a foreign government or intelligence service

WHO: International researcher collaborator (individual)
Past association with an institution on FIDMIT Institutions of Concern List (graduate, co-authorship, patents)
Current association with an institution listed on FIDMIT Institutions of Concern List (including co-authorship, patents)
Providing inconsistent, changing or incorrect information or reluctance to engage with due diligence processes
Irregularities or inability to verify experience, expertise or publishing history
The international collaborator and/or their research group is unknown to the UQ collaborators

WHO: The researcher (UQ researcher or HDR student)
The UQ researcher has specialist expertise in sensitive fields on the UQ Sensitive Research Fields List which would be attractive to foreign actors
The UQ researcher is vulnerable to foreign interference due to a real or perceived conflict of interest (e.g. financial interest in partner organisation)
The UQ researcher has links to a foreign government

WHAT: The focus of the research
The subject of the research is potentially dual-use with military as well as civilian applications
The research is subject to sanctions or defence trade controls
The subject of the research is listed on UQs Sensitive Research Areas list
The subject of the research has potential to threaten Australia's national interests (e.g. defence research)

HOW: The nature of the collaboration/ engagement
The nature of the collaboration means that sensitive information, research, data, technologies or intellectual property will be accessible to non-UQ individuals or organisations
Invitations—both solicited and unsolicited—to participate in international conferences, which include excessive offers of hospitality or gifts, such as all-expenses-paid trips
Overly generous terms of the proposed collaboration
Unusual, unsolicited, or persistent attempts to access research papers or material, including unpublished data
The nature of the Collaboration means sensitive information, research, data, technologies or intellectual property will be hosted in inadequately protected systems or facilities
Foreign delegations wanting to enter sensitive research facilities, such as laboratories, for tours or meetings

Other documents – FIDMIT Endorsed Sensitive Institutions List

Available to authorised officers in Workday

Other documents – FIDMIT Endorsed Sensitive Research Fields list

Available to authorised officers in Workday

Metadata for document management

Metadata

Associated Information	Legislation Autonomous Sanctions Act 2011 Defence Trade Controls Act 2012 Foreign Influence Transparency Scheme Act 2018 (FITSA) Australia's Foreign Relations (State and Territory Arrangements) Act 2020 Documents International Agreements Policy International Agreements Procedure Cyber Security Policy Information Security Classification Procedure Use and Management of UQ Land, Building and Facilities Policy Foreign Influence Disclosure Procedure Conflict of Interest for Members of Staff Procedure Consultancy, Secondary Employment and Internal Work Policy Export Controls and Sanctions Frameworks Procedure Website links Conflict of Interest Online Disclosure Tool Foreign Influence Disclosure UQ complaints website Secondary Employment Register UQ Sensitive Research Register (SRR) Critical Technologies List (CTL) Chinese Defence Universities Tracker — ASPI		
Area of responsibility	Provost		
Policy Owner	Provost		
Document Author	Pro-Vice-Chancellor (Research)		
Document Category	Governance and Legal		
Document Realm	Governance		
Target Audience	☒ Staff	☐ Students	☐ Community
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