Collaborating with Sensitive Jurisdictions in a Sensitive Area

Enabling Policy Statement; Executive Owner; Approval Route:	Vice-President, Global
Is the Procedure for internal use only	Disclosable
Associated Policy Statements:	Our Colleagues - Chief People Officer Our Data - Chief Operating Officer Our Research and Innovation - Pro-Vice Chancellor, Research, and Innovation Our Students - Chief Student Officer
Authorised Owner:	Associate Vice-President, External Engagement
Authorised Co-Ordinator:	International Partnerships Manager
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Approval History

Version	Reason for review	Approval Route	Date
1.0	Creation of Procedure	PRC	29/11/23
1.1	Review of Procedure after first year of operation	PRC	18/03/25

1. Purpose

1.1. Protecting the integrity of the system of international research collaboration and maintaining a strong reputation for the University as a trusted higher education and research institution, ensures the University continues to attract world-class researchers, secure research funding, and build strong, productive international partnerships.

The purpose of this Procedure is to ensure that the University continues to foster constructive international partnerships from all regions of the globe, while managing the associated risks to UK national security, the University and those involved in such collaboration.

This goal is undertaken by defining the range of specific research, financial, and reputational risks to the University, set against six criteria that require due consideration by academic staff, research students, and professional services staff alike. The objective of the Procedures outlined in this document is twofold:

First. T**o make clear the process** by which the University makes decisions in cases relating to collaborating in Sensitive Areas with persons and organisations, including those that may have a control in that organisation in, or connected with a Sensitive Jurisdiction, providing a clear framework that moves from the original enquiry regarding a given collaboration **via an escalation process** through to approvals being granted, or withheld.

Second. To make clear the criteria relating to the various types of risk, and the **methods by which risk is scored as high, medium, or low**, allowing informed understanding, and subsequently judicious decision-making regarding the range of possible collaborations.

2. Scope and Exceptions to the Procedure

2.1. A combination of academic and professional services staff at faculty, group or committee level have defined, and designed, a robust process to identify and escalate potentially high-risk collaborations or activities in Sensitive Areas with persons or organisations in or connected with a Sensitive Jurisdiction. This process will commence at faculty level, but the Partnerships and Reputation Committee (PRC) evaluates the overall level of risk associated with the proposed collaboration, and then makes the final decision on how to proceed.

2.2. At the heart of this Procedure are the University's **elevated risk assessment mechanisms**, including **escalation to key decision-makers in faculties and committees**, carried out based on this Procedure and related policy documents, via trained staff using specialist resources, to analyse and examine the proposed activity at a greater degree of depth and scrutiny than normal 'business-as-usual' due diligence.

2.3. This Procedure applies to all employees, students including visiting and emeritus staff and visiting students who are involved in any activity relating to academic collaborations and partnerships with people and organisations in or connected with Sensitive Jurisdictions in a Sensitive Area.

3. Definitions and Terminology

3.1. **Sensitive Jurisdiction**: is a country or geographic area where UK or US sanctions apply, but also includes Peoples Republic of China, including Hong Kong (as a 'systemic competitor' *) and Russia (as an aggressor state in respect of Ukraine).
https://search-uk-sanctions-list.service.gov.uk/
https://ofac.treasury.gov/sanctions-programs-and-country-information

* As stated in the UK Integrated Security and Defence Review 2021 and refresh 2023

3.2. **The Sensitive Areas of the UK economy (17)** as provided in The National Security and Investment Act are:
Advanced Materials
Advanced Robotics
Artificial Intelligence

Civil Nuclear
Communications
Computing Hardware
Critical Suppliers to Government
Cryptographic Authentication
Data Infrastructure
Defence
Energy
Military and Dual-Use
Quantum Technologies
Satellite and Space Technologies
Suppliers to the Emergency Services
Synthetic Biology
Transport
For more guidance on these Government prescribed areas refer to:
https://www.gov.uk/government/publications/national-security-and-investment-act-guidance-on-notifiable-acquisitions/national-security-and-investment-act-guidance-on-notifiable-acquisitions

3.3. **Formal academic collaboration** occurs when funding is involved for academic activities that are conducted inside the usual University structure or formalised framework.

3.4. **Informal academic collaboration** are academic activities that are conducted outside of - the usual University structure or formalised framework of academic research – such as personal research which involves the exploration and investigation of academic topics or questions without the constraints of strict methodologies, funding, or institutional oversight. This includes when travel expenses, accommodation and/or subsistence costs are met by the collaborating partner.

3.5. **Startups or joint ventures**: Includes 'Spinouts' and 'Spin-Ins' and equity investment.

3.6. **Student Mobility**: For the purposes of this Procedure includes postgraduate student exchanges, placements/internships, Post Graduate research placements.

3.7. **Dual-Use** means goods, software and technology that can be used for both civilian and military applications (See 6.4.1 for the link to Consolidated list of strategic military and dual-use items).

3.8. **Risk Analysis**: as per Table 1.0 in section 4.3.

3.9. **Knowledge Exchange**: A process encouraging the sharing of ideas, data, experience, and expertise.

3.10. **Technology Readiness Level (TRL)** is a type of measurement system used to assess the maturity level of a particular technology.

4. Assessing Risk: A Guide for Staff

To answer the question of "how do I assess risk?", University staff follow three key steps: (1) **the applicable area (2) the consideration of risk criteria, and (3) the application of a specific risk score.** Proposed collaborations that score 'High' in all the three risk scoring categories (research, reputation, financial), as per table 4.3 will be referred to PRC.

4.1 Applicable Areas for an Elevated Risk Protocol:

The six areas of research, educational and commercial activity involving a Sensitive Area and a person or organisation in or connected with a Sensitive Jurisdiction, in which an elevated risk protocol operates are currently:

- Formal academic collaborations
- Informal academic collaborations

- Startups or joint ventures
- Student Mobility
- International travel including advice on Information Technology (IT) equipment.
- Staff recruitment and visiting appointments.

If the proposed activity takes place within any one of these six areas, staff must first examine and apply the following risk criteria, and then apply a subsequent risk level.

4.2 **Criteria Relating to the Various Types of Risk:**

The following 6 considerations represent the criteria on which risk is assessed which include areas specifically under UK Government regulations connected with protecting national security:

- **Institutional reputation**: Consideration as to how the collaboration aligns with the University's institutional reputation, values, and long-term strategic goals.

- **Reputation and personal safety of any of our staff or students:** Consideration as to the scope of the collaboration, specifically in terms of whether it exposes University staff or students to any form of legal or physical risk.

- **Source of any identified funding:** Consideration as to the source of any proposed funding, attached to a given form of collaboration.

- **Compliance with Export Controls and other UK Government regulations:** Consideration as to whether the proposed activity is compliant with Export Control and any other UK legislative requirement, including ATAS clearance, or the National Security and Investment Act.

- **Intellectual property protection**: Consideration as to how the University's intellectual property rights will be protected and preserved in the proposed activity.

- **Data protection and security:** Consideration as to the role and treatment of data in the envisaged collaborations, including its data protection and security measures.

4.3 **Scoring Risk: low, medium, or high**

TABLE 1 (See Annex 1 Figure 1: Flow chart summarising the assessment of risk below.)

Scoring Risk	**Low**	**Medium**	**High***
Research Risk To what extent does the research or Knowledge Exchange fall within the **17 Sensitive Areas?** *and* What is its Technical Readiness Level?	The anticipated research or Knowledge Exchange is connected to one of the 17 areas, no military or Dual Use, and is low risk due to its current or anticipated low technical readiness and/or being fully published and in the public domain.	The anticipated research or Knowledge Exchange falls in scope of the 17 areas of sensitivity, no military or Dual Use but is or anticipated to be medium technical readiness and/is in the public domain and or intended to be published	The anticipated research or Knowledge Exchange falls in scope of the 17 areas of sensitivity and involves technology that is intended for a military application or is Dual Use The technology is likely to be high risk due to its

			medium to high technical readiness and/or lack of publication and in the public domain, with scope for new research expected from it.
Scoring Risk	**Low**	**Medium**	**High***
Reputational Risk To what extent does the proposed collaboration (including its principal participants) align with the University's institutional reputation, values, and long-term strategic goals? To what extent does the proposed collaboration (including its principal participants) expose University staff or students to any form of legal, physical, or financial risk?	The proposed collaboration (including its principal participants) **aligns strongly with** the University's institutional reputation, values, and long-term strategic goals. The proposed collaboration (including its principal participants) **does not expose** University staff or students to any form of legal or physical risk.	The proposed collaboration (including its principal participants) **is agnostic regarding** the University's institutional reputation, values, and long-term strategic goals. The proposed collaboration (including its principal participants) **is indeterminate** as to the exposure of university staff or students to legal or physical risk.	The proposed collaboration (including its principal participants) **runs counter to** the University's institutional reputation, values, and long-term strategic goals. The proposed collaboration (including its principal participants) **has the potential** to expose University staff or students to legal or physical risk.
Scoring	**Low**	**Medium**	**High***
Financial Risk This is considered only following a decision from the assessment of the Research and Reputational risk first. If both are High, then approval may be refused without moving to assessing financial risk	Research/Knowledge Exchange and Reputational risk are assessed as low and the cost to the University in monitoring and managing these risks is proportionate when assessed against the financial return.	Research/Knowledge Exchange and Reputational risk are assessed as medium and/or only one element is assessed as high and the cost to the University in monitoring and managing these risks is proportionate when assessed against the financial return.	Research/Knowledge Exchange and Reputational Risk are assessed as high and the cost to the University in monitoring and managing the risks is disproportionately high when assessed against the financial return.

* Proposed collaborations that score 'High' in all the three risk scoring categories (research, reputation, financial) are unlikely to be approved

5. Risk Assessment Procedure

Academics considering academic collaborations with an individual or organisation in or connected with a Sensitive Jurisdiction, within a Sensitive Area, should speak first with their respective line managers. These discussions are important to determine the full nature and implications of the potential. In moving through the step processes

detail below, there will be a range of faculty or professional services staff who may in turn seek advice from other relevant parties within the University, and/or recommend speaking with other internal Research, Innovation, and Impact Directorate experts before proceeding.

Each of the six **Applicable Areas for an Elevated Risk Protocol** have different stepwise requirements in terms of (1) determining the risk assessment and if necessary (2) escalating the proposal up the relevant risk protocol. These steps are explained in detail below with a summary in Annex 2:

5.1. Formal Academic Collaboration with a Person or Organisation in a Sensitive Jurisdiction

Context:
If your proposed research collaboration is in a Sensitive Area with a person or organisation in or connected with a Sensitive Jurisdiction, then the proposal will be subjected to an elevated due diligence process (led by the University's central professional service teams within the Research, Innovation, and Impact Directorate), and approval to proceed will be required from within the relevant Faculty and ultimately, the University's Partnerships and Reputation Committee (PRC). This elevated due diligence and decision-making process is likely to lengthen the formal project approval period by several weeks. Your project will be subject to formal agreement, supported by experienced professional staff. This will provide greater certainty around the expectations of a research partner or funder.

Where an agreement is subject to non-UK jurisdiction and you are working in your collaborator's country, there may be different laws around sharing personal data or research outcomes and legal protections for Intellectual Property (IP) may differ. The formal agreement will provide some security in terms of control and acknowledgment of publication and intellectual property as well as managing the parties' expectations.

Process Steps
Step 1: Familiarise yourself with the contents of the University's internal SharePoint site on Trusted Research https://surreyac.sharepoint.com/sites/TrustedResearch which aims to raise awareness of the risks of undertaking international research. If, having familiarised yourself with the contents on Trusted Research, you wish to proceed, then move to Step 2.

Step 2: Discuss your intentions as early as possible with your Faculty's Research and Innovation Manager, who may recommend you speak with other colleagues in the Research, Innovation, and Impact Directorate to receive specialist advice. If you decide to proceed, then move to Step 3.

Step 3: Complete the formal intention process for your Faculty Research and Innovation Office. The collaboration will be flagged as requiring an elevated and thorough due diligence process led by the University's central professional service teams. It will be flagged to your Head of Department (HOD)/Head of School (HOS) for approval. If proposed collaboration is not supported, then an appeal is to Associate Dean International (ADI)/Associate Dean Research and Innovation (ADRI). If supported, then move to Step 4.

Step 4: To be notified to ADI/ADRI; if not supported appeal to Pro-Vice-Chancellor, Executive Dean (PVCED). If not supported, the proposed collaboration may not proceed further. If supported, then move to Step 5.

Step 5: Professional Services will provide a detailed report including the risk analysis as per Table 1 and mitigations to the Pro-Vice-Chancellor for Research, Innovation, and Impact (PVCRII). PVCRII may recommend, with support of Chair of Partnerships and Reputation Committee (PRC), that further guidance is sought from Government bodies such as Research and Collaboration Advise Team (RCAT) and/or Export Joint Control Unit (EJCU). PVCRII presents a report to PRC with recommendations for approval or not, based on the scored risk assessment. PRC decision may be to approve, subject to following any mitigations and processes recommended, decline to approve, or may defer its decision and request further investigations or guidance from Government bodies before making its final decision, then move to Step 6.

Step 6: PRC may ask for further investigations or guidance from Government bodies to be obtained before deciding. Information will be collected and reported to PRC for a decision as detailed in Step 5.

5.2 Informal Academic collaborations with a Person or Organisation in a Sensitive Jurisdiction

Context:
Informal collaborations often occur through personal interest, independent inquiry or collaborations among researchers, colleagues, or peers. They can take the form of discussions, literature reviews, academic publications, pilot studies, data exploration or creative exploration of ideas. While informal collaborations may lack the rigorous methodologies and systematic Procedures of formal research, they can still contribute to knowledge generation, innovation, and the development of new insights, often serving as a starting point for further investigation within the formal research context. However, even informal academic collaborations in Sensitive Areas with individuals and universities in or connected with Sensitive Jurisdictions can have risk associated with them.

Therefore, due diligence and appropriate agreements for an informal academic collaboration are no less important from an institutional or personal reputational point of view than the more formal collaborative relationship involving funding. There is the same obligation to undertake suitable due diligence and comply with relevant laws relating to export control, National Security and Investment Act and data protection and approval to proceed will be required from the University's Partnerships and Reputation Committee (PRC).

All University academics planning an informal collaboration with a person or organisation in or connected with a sensitive jurisdiction, which includes when travel expenses are being met by the collaborating partner, must undertake the following.

Process Steps
Step 1: Familiarise yourself with the contents of the University's internal SharePoint site on Trusted Research https://surreyac.sharepoint.com/sites/TrustedResearch which aims to raise awareness of the risks of undertaking international research. If, having familiarised yourself with the contents on Trusted Research, you wish to proceed, then move to Step 2.

Step 2: Discuss with your Head of Department (HOD)/Head of School (HOS); if the proposed Collaboration is not supported, appeal is to Associate Dean International (ADI)/Associate Dean Research and Innovation (ADRI). If supported, then move to Step 3.

Step 3: Discuss with ADI/ADRI.

Step 4: ADRI may request more due diligence guidance from University's central professional service teams and may discuss with Pro-Vice-Chancellor, Executive Dean (PVCED) or move to step 5. If not supported, appeal to PVCED. If not supported, the proposed collaboration may not proceed. If supported, then move to Step 5.

Step 5: Professional Services will provide a detailed report, including risk analysis as per Table 1 and mitigations to the Pro-Vice-Chancellor for Research Innovation and Impact (PVCRII). The PVCRII may recommend, with support of Chair of Partnerships and Reputation Committee (PRC), that further guidance is sought from Government bodies such as Research and Collaboration Advise Team (RCAT) and/or Export Joint Control Unit (EJCU). PVCRII presents a report to PRC with recommendations for approval or not, based on the scored risk assessment. PRC decision may be to approve, subject to following any mitigations and processes recommended, decline to approve, or may defer its decision and request further investigations or guidance from Government bodies before making its final decision, then move to Step 6.

Step 6: PRC may ask for further investigations or guidance from Government bodies to be obtained before deciding. Information will be collected and reported to PRC for a decision as detailed in Step 5.

5.3 Start-Ups or Joint Ventures Involving a Sensitive Area and a Person or Organisation in or Connected with a Sensitive Jurisdiction

Context:
It is sometimes the case that entrepreneurs offer our researchers shares in a start-up company in exchange for their time, or contribution, for helping a company start-up 'Spin-In'. In the case of a 'Spin-Out' involving University IP, there may be opportunities presented in the form of equity investment. In each case, the provisions of the University's Intellectual Property (IP Code) apply. The University IP Code stipulates that any intellectual property created as a result of employment with the University should be declared to the Technology Transfer Office, in the form of an invention disclosure, via the dedicated inventor portal.

Regardless of whether you are student or a member of staff, if a person or organisation from a sensitive jurisdiction offers you shares in exchange for your support in a new business venture, you should immediately contact the Technology Transfer Office, techtransfer@surrey.ac.uk, who will then provide you with appropriate support. If you already own shares in a company in a sensitive jurisdiction then you should familiarise yourself with our Procedure for Ethical Conduct, specifically the section on Conflicts of Interest. This Procedure will request you to declare your interest formally to the University.

All University staff planning start-ups or joint ventures in a Sensitive Area and involving a Person or Organisation in or connected to a Sensitive Jurisdiction must undertake the following.

Process Steps
Step 1: Familiarise yourself with the contents of the University's internal SharePoint site on Trusted Research https://surreyac.sharepoint.com/sites/TrustedResearch which aims to raise awareness of the risks of undertaking international research. If, having familiarized yourself with the contents on Trusted Research, you wish to proceed, then move to Step 2.

Step 2: Discuss with HOD/HOS. If not supported, then appeal to ADI/AD. If supported, move to Step 3.

Step 3: Discuss with ADI/ADRI who may request more due diligence guidance from University's central professional service teams and may discuss with Pro-Vice-Chancellor Executive Dean (PVCED) or move to Step 5. If not supported, appeal to PVCED. If it is not supported, the proposed collaboration may not proceed. If supported, then move to Step 4.

Step 4: Contact Technology Transfer Office which will liaise with Professional Services to produce a detailed report including risk analysis and mitigations to the Pro-Vice-Chancellor for Research, Innovation, and Impact (PCVRII).The PVCRII may recommend with support of Chair of Partnerships and Reputation Committee (PRC) that further guidance is sought from Government bodies such as Research and Collaboration Advise Team (RCAT) and or Export Joint Control Unit (EJCU). PRC decision may be to approve, subject to following any mitigations and processes recommended, not approve, or defer decision as PRC may ask for further investigations or guidance from Government bodies before making its final decision and then move to Step 5.

Step 5: PRC may ask for further investigations or guidance from Government bodies to be obtained before deciding. Information will be collected and reported to PRC, and then move back for a decision as detailed in Step 4.

5.4 International Travel including advice on IT equipment.

Context:
Mobile devices such as laptops, smartphones, and tablets, along with organisational cloud services, remote connections to enterprise networks and databases, facilitate work during international travel. However, mobile devices are particularly susceptible to compromise, theft, physical damage, and loss, regardless of user location. Use of mobile devices during international travel can intensify this risk, so you should take steps to ensure University data and intellectual property is not irrecoverably lost, and to prevent confidential data falling into the wrong hands.

If you are working in an area which potentially produces knowledge or intellectual property which the British Government would consider to be a Dual Use Technology, and your laptop or phone facilitates access to research outputs or knowledge which would be in scope of an Export Control license, then you may be inadvertently

breaking UK law. In these circumstances, you must not take your normal University issued IT equipment with you and should, instead, request a Travel Loaner laptop.

All University academics involved in research in Sensitive Areas undertaking **international travel to and within a** Sensitive Jurisdiction, must undertake the following steps, **including advice on IT equipment:**

Process Steps
Step 1: Familiarise yourself with the contents of the University's internal SharePoint site on Trusted Research https://surreyac.sharepoint.com/sites/TrustedResearch which aims to raise awareness of the risks of undertaking international research, particularly Export Control legislation. Training courses are offered by our Trusted Research Team trustedresearch@surrey.ac.uk.

Step 2: If you are involved in research in a Sensitive Area and travelling to a Sensitive Jurisdiction then you should **consider not taking your normal University-issued IT equipment with you** (laptop, phone, or other device such as a tablet). For more information, see the Devices for International Travel Procedure. If, following risk-assessment, you decide not to take your standard University-issued IT equipment, move to Step 3. If you decide to take your standard University-issued IT equipment, then move to Step 4.

Step 3: Staff may request a Travel Loaner laptop via the IT Request Forms page on Surreynet, at least 10 days ahead of their date of travel to allow for the new device deployment.

Step 4: Ensure you are compliant with all relevant UK Export Control legislation, as well as the country you are visiting. Safeguard your university-issued laptop by following guidance in the University's Devices for International Travel Procedure.

5.5 Staff Recruitment and Visiting Appointments

Context:
Academic Technology Approval Scheme (ATAS)

ATAS is a certificate issued by the Foreign, Commonwealth & Development Office (FCDO) giving an individual security clearance to study subject areas where the knowledge gained may have application in the development or delivery of weapons of mass destruction (e.g., certain science subjects, mathematics, engineering, computer technology etc.)

It is highly likely that the ATAS scheme will apply for overseas visitors from Sensitive Jurisdictions coming to the University if their research area is one of the 17 Sensitive Areas of the UK economy. More broadly, any individual will be subject to ATAS if the individual will be taking part in, or undertaking research at, postgraduate level or above, as part of "Permitted Academic Activity", in a relevant subject to ATAS.

The following is considered to be "Permitted academic activity":

- Gathering information and facts for a specific project which directly relates to their employment overseas, or to support independent research.
- Taking part in formal exchange arrangements with UK counterparts.
- Carrying out research for their own purposes or as a group.
- It is therefore a UK Government assessment and decision whether to grant an individual ATAS clearance.

Visitors who will be attending meetings, conferences, seminars, or interviews, or giving speeches, and will not be undertaking research during their time in the UK, will not need to apply for an ATAS certificate.

All University academics involved in staff recruitment and/or visiting appointments involving Sensitive Areas and persons based within or connected with a Sensitive Jurisdictions must undertake the following steps.

Process Steps

Step 1: Determine whether the individual is in scope of ATAS Find out if you need an ATAS certificate. If not in scope, then the normal visa process applies. If in scope, then move to Step 2.

Step 2: The individual must apply for and obtain a valid ATAS certificate before any research starts. It is strongly recommended that the visitor obtains an ATAS certificate prior to travelling to the UK. If a valid ATAS certificate is issued, the individual must provide this to Faculty HR. Move to Step 3.

Step 3: Familiarise yourself with the University's Visiting Academic Staff Appointment Procedures which contains more information on the Procedures to follow when proposing a visiting academic member of staff. Upon completion, then move to Step 4.

Step 4: Familiarise yourself with the University's Global Mobility Guidance for context and policy. Adherence to this guidance will enable us to benefit from increasingly global environments for employment, research, and education, whilst bolstering our ability to mitigate the risks highlighted above.

5.6 Student Mobility

Context:
Staff: *Any* ***new proposals*** *for Student Exchange or Study Abroad collaborations should be submitted to the* International Engagement Office. Information for Surrey students is available on the https://surreyac.sharepoint.com/sites/SurreyAbroad/ SharePoint site. The proposing School/Department will need to submit an Initial Proposal Form for Exchange Agreements along with a Risk Assessment Form to the International Engagement Office (IEO) for initial review. New proposals and proposals for agreement renewals will be considered by the relevant Faculty International Mobility Committee, the Dean International, and then submitted for approval to the External Engagement Committee.

Students: All students engaging in outbound international mobility opportunities must be formally registered in the International Engagement Office's mobility database. This is to ensure appropriate due diligence is undertaken in advance of an international mobility placement, so that pre-departure support and guidance is made available to students, and to enable the University to remain compliant with HESA reporting requirements. Information for Surrey students is available on the Study and Work Abroad pages on MySurrey. Incoming short-term visiting students coming on exchange, study abroad or for research placements at undergraduate or Postgraduate Taught level must apply via the International Engagement Office.
Visiting Postgraduate Researchers will need to apply via Admissions.

All University academics and post graduate students involved in student mobility programmes **based within or involving Sensitive Jurisdiction and a Sensitive Area** must undertake the following steps.

Process Steps
Step 1: Familiarise yourself with the contents of the University's internal SharePoint site on Trusted Research https://surreyac.sharepoint.com/sites/TrustedResearch which aims to raise awareness of the risks of undertaking international research. If, having familiarized yourself with the contents on Trusted Research, you wish to proceed, then move to Step 2.

Step 2: Discuss with Supervisor/School Approver. If supported complete Risk Assessment for Travel abroad https://surreyac.sharepoint.com/sites/SurreyAbroad/SitePages/Risk-Assessment.aspx , move to Step 3.

Step 3: Supervisor to discuss with ADI. If supported, ADI signs Risk Assessment for Travel Abroad move to Step 4.

Step 4: ADI will prepare report for PRC for approval. If approved, move to Step 5.

Step 5: Student follows process outlined on Surrey Abroad to register proposed mobility with the International Engagement Office.

6 Governance Requirements

6.1 Implementation: Communication Plan

6.1.1 This Procedure is communicated to all staff as part of the University Policies and Procedures website.
6.1.2 Socialisation through appropriate structures and groups at faculty level, including staff and students as relevant.

6.2 Implementation: Training Plan

6.2.1 All Process Steps emphasis and signpost sector guidance and training available on the Trusted Research SharePoint pages.
6.2.2 From time-to-time the PRC will mandate obligatory training is undertaken such as Export control training by individual or groups of staff and/or students.

6.3 Review

6.3.1 This Procedure is regularly reviewed by Partnerships and Reputation Committee PRC. Minor changes will be reviewed and agreed by PRC. Major changes will be reviewed through PRC and submitted to Council for noting. Review will typically be every three years unless legislative changes require earlier major changes.

6.4 Legislative Context and Higher Education Sector Guidance or Requirements

6.4.1 This Procedure complies with the following legislative requirements:

National Security and Investment Act 2021:
https://www.legislation.gov.uk/ukpga/2021/25/contents/enacted

Consolidated list of strategic military and dual-use items that require export authorisation:
https://www.gov.uk/government/publications/uk-strategic-export-control-lists-the-consolidated-list-of-strategic-military-and-dual-use-items-that-require-export-authorisation

Academic Technology Approval Scheme (ATAS): https://www.gov.uk/guidance/academic-technology-approval-scheme

6.4.2 This Procedure also acknowledges the information contained in good practice guides:

UK Research and Innovation (UKRI) polices for Trusted Research and Innovation 2023:
https://www.ukri.org/manage-your-award/good-research-resource-hub/trusted-research-and-innovation/

National Protective Security Authority (formally CPNI) 2023: https://www.npsa.gov.uk/trusted-research

6.5 Sustainability

6.5.1 This Procedure has no impact on carbon emissions or on energy consumption.

7 Stakeholder Engagement and Equality Impact Assessment (*steps are being taken to obtain this*)

7.1 An Equality Impact Assessment was completed on **dd/mm/ccyy** and is held by the Authorised Co-ordinator.

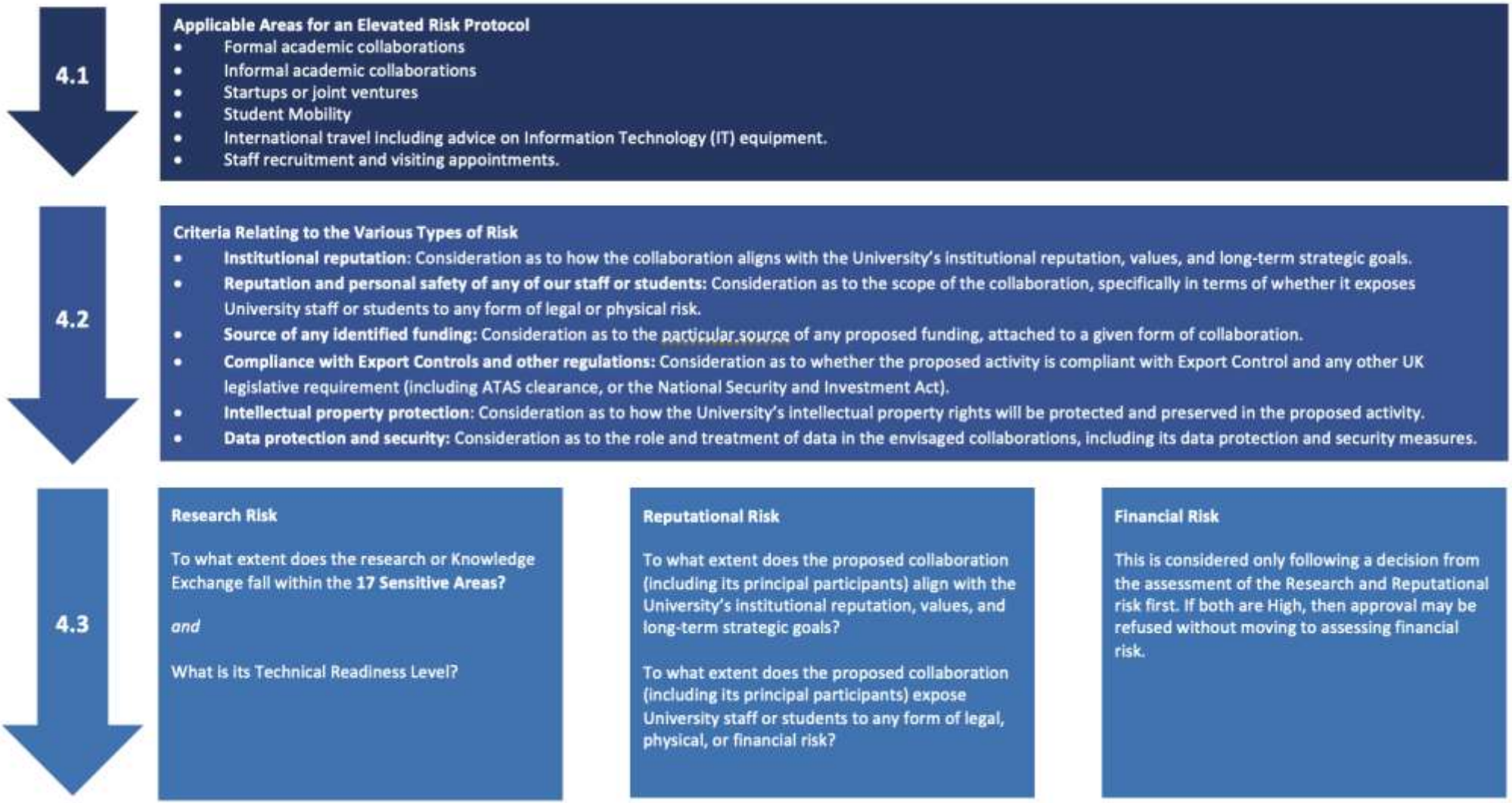
7.2 Stakeholder Consultation was completed, as follows:

Stakeholder	Nature of Engagement	Request EB Approval (Y/N)	Date	Name of Contact

Governance	Involved in drafting and review	N	10.11.23	Andea Langley
H&S	Provision of procedure	N	14.11.23	Matthew Purcell
Sustainability	Provision of procedure	N	10.11.23	Martin Wiles
Our Colleagues - Chief People Officer	Involved in review and drafting	N	10.11.23	Lois Moor
Our Data – Chief operating Officer	Involved in drafting and review	N	10.11.23	Ambrose Neville
Our Research and Innovation – Pro- Vice Chancellor, Research Innovation, and Impact	Involved in drafting and review	N	10.11.23	Gill Fairbairn
Our Students – Chief Student Officer	Involved in Drafting and review	N	10.11.23	Elizabeth Lynch

Annex 1

Figure 1: Flow chart summarising the assessment of risk.



Annex 2

Figure 2: Risk Assessment and Escalation for the Six Applicable Areas

Formal Academic Collaboration with a Person or Organisation in a Sensitive Jurisdiction Requires PRC Approval	Informal Academic collaborations with a Person or Organisation in a Sensitive Jurisdiction Requires PRC Approval	Start-Ups or Joint Ventures Involving a Sensitive Area and a Person or Organisation in or Connected with a Sensitive Jurisdiction Requires PRC Approval	International Travel including advice on IT equipment Requires Government Approval (Export Control)	Staff Recruitment and Visiting Appointments Requires Government Approval (ATAS)	Student Mobility Requires PRC Approval
• **Step 1**: **Read** the content on Trusted Research pages for international research risks.	• **Step 1**: **Read** the content on Trusted Research pages international research risks.	• **Step 1: Read** the content on Trusted Research pages for international research risks	• **Step 1**: **Read** the content on Trusted Research pages for international research risks	• **Step 1**: **Read** the content on Trusted Research pages for international research risks	• **Step 1** : **Read** the content on Trusted Research pages for international research risks. If proceeding step 2.
• **Step 2**: **Discuss** your intentions with your FRIM.	• **Step 2**: **Discuss** with HOD/HOS	• **Step 2: Discuss** with your HOD/HOS. If supported or not move to Step 3.	• **Step 2**: **Assessment**. If you are involved in research in a Sensitive Area and do not want take your University issued IT equipment, move to Step 3. If you want to take your University issued IT equipment, move to Step 4.	• **Step 2: Assessment**. If individual is not in scope of ATAS, the normal visa process applies; if in scope move to step 3;	• **Step 2**: **Discuss** with Supervisor/School Approver. If not supported stop; if supported, complete Risk Assessment and move to Step 3.
• **Step 3**: Complete the formal intention process for your FRIO.	• **Step 3: Discuss** potential collaboration with ADI/ADRI/PVCED. If not approved stop; if approved, step 4.*	• **Step 3**: **Discuss** with ADI/ADRI/PVCED. If not approved stop; if supported, proceed to Step 4.*	• **Step 3**: Request a Travel Loaner laptop.	• **Step 3: Assessment** by UK Government following individuals' application for ATAS certificate. Certificate is refused, stop; certificate is issued, the individual must provide this to Faculty HR. Move to Step 4;	• **Step 3**: Supervisor to **Discuss** with ADI. If not supported stop; if supported, ADI signs Risk Assessment or may move to Step 4.*
• **Step 4**: Flagged to HOD for approval. Approved move to step 6. Not approved move to step 5.	• **Step 4**: **Report** by Professional Services report with risk analysis and mitigation measures for PVCRII to present to PRC. **	• **Step 4: Report** by the Technology Transfer Office, with risk analysis and mitigation measures for PVCRII to present to PRC.**	• **Step 4**: Comply with Export control legislation from the UK and country you are visiting. Comply with the University's Devices for International Travel.	• **Step 4: Read** the University Visiting Academic Staff Appointment. Upon completion, move to Step 4;	• **Step 4**: **Report** for PRC by ADI for PRC approval following ADI referral.
• **Step 5**: **Discuss** potential collaboration with ADI/ADRI/PVCED. If not approved stop; if approved, step 6.*	• **Step 5**: **Assessment and decision by PRC**.***	• **Step 5**: **Assessment and decision by PRC**.***		• **Step 5: Read** the University Global Mobility Guidance for context and policy.	• **Step 5: Assessment and decision by PRC. If not approved stop. If approved step 6*** **
• **Step 6**: **Report** by Professional Services with risk analysis and mitigation measures for PVCRII to present to PRC.**					• **Step 6**: Student continues process outlined on Surrey Abroad to register mobility with International Engagement Office.
• **Step 7**: **Assessment and decision by PRC**.***					