

Process for managing assessment of HDR and other research program applications in conformity with international sanctions and controls

Approving authority	Executive Group
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Document URL	http://policies.griffith.edu.au/pdf/Process for managing assessment of HDR and other applications international sanctions and controls.pdf
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Description	Section 3.4 of the Higher Degree Research Policy states that the Dean, Griffith Graduate Research School may approve an application for candidature for a HDR Program provided that the provision of educational services consequent upon approval of the application for candidature will not expose the University to a risk of contravening any applicable international sanctions or controls. The Sanctions Compliance Policy requires diligence to be applied by the Vice President (Global) to ensuring that international enrolments in Other Relevant Programs will not expose the University to a risk of contravening any applicable international sanctions or controls. This document sets out the process by which the University manages Higher Degree Research admissions, admissions to Other Relevant Programs and variations to underlying research projects in a manner which ensures the University is not exposed to a risk of contravening any applicable international embargoes, sanctions or controls.

Related documents

[Autonomous Sanctions Act 2011](#)

[Defence and Strategic Goods List and its associated online search tool](#)

[Defence Trade Controls Act 2012](#)

[United Nations Act 1945](#)

[Weapons of Mass Destruction \(Prevention of Proliferation\) Act 1995](#)

[Consolidated List kept by DFAT](#)

[Sanctions Compliance Policy](#)

#Sanctions Compliance Form# (as that document is from time to time approved by the Senior Deputy Vice Chancellor) [Contact Office for Research for a copy of the Form]

At Risk School or Research Centre List (as that document is from time to time approved by the Senior Deputy Vice Chancellor) [Contact Office for Research for a copy of the Form]

[Higher Degree Research Policy](#)

[Register of Compliance Obligations](#)

[[Background](#)] [[Cornerstones of Compliance](#)] [[The Process – HDR Applications and Changes of Research Topic](#)] [[The Process – Other Relevant Programs](#)] [[Appeals and Updates](#)] [[Annexure A: Risk Matrix](#)] [[Annexure B: Definitions Used In This Process](#)]

1. BACKGROUND

1.1 Australia's Sanctions

Australia's international sanctions response imposes a complex matrix of restrictions upon the supply of a range of goods and services (including the supply of training and technology) to specific individuals, organisations, foreign nations and their citizenry. Sanctions will apply to international students undertaking HDR Programs and Other Relevant Programs if:

- they or their families are subject to a direct and personal sanction (and this might be the case if they or their family has been involved at a senior level in an egregious regime or terrorist organisation or if they or their family has been involved in crimes against humanity);
- they come from a country which is subject to a sanction and the nature of the research they intend to conduct involves a sanctioned supply of technology or services to the student or their research involves access to high risk equipment and materials (for example, those with dual use capabilities i.e. products and technologies normally used for civilian purposes but which may have military applications); or
- the international student, regardless of their country of origin, intends to conduct research that will likely involve them having access to DSSL items or technologies, or technologies that are related in any manner to weapons of mass destruction.

1.2 Purpose of Process

This document sets out the process for managing HDR Admissions, changes to HDR research topics and assessing research components of Other Relevant Programs to ensure that student research conducted at Griffith University does not contravene Australian Sanctions.

2. CORNERSTONES OF COMPLIANCE

2.1 Compliance Tools and Resources

The Senior Deputy Vice Chancellor will cause to be kept and updated:

- (a) the Sanctions Portal: an intranet site available to staff which publishes information about international sanctions applicable to Griffith University;
- (b) the Sanctions Compliance Form: a sanctions compliance form available to staff as a tool for assessing a range of university activities against current sanctions; and
- (c) the At Risk Elements List: a list of At Risk Elements the teaching, research and other activities of which might potentially involve a breach of sanctions.

2.2 Risk Matrix Table

The table in Annexure A lists the risk rankings to be attributed to Assessed HDR Applications and Assessed Other Program Applications, together with corresponding outcomes to be applied as a consequence of the ranking attributed to the application.

3. THE PROCESS – HDR APPLICATIONS AND CHANGES OF RESEARCH TOPIC

3.1 Initial identification of a potential issue

Manager Admission and Candidature, Griffith Graduate Research School will cause all HDR applications (including change of research topic applications made by a student enrolled pursuant to an Assessed HDR Application) relating to prospective international students from countries subject to Australian Sanctions to be automatically flagged in the HDR admissions system. Manager Admission and Candidature, Griffith Graduate Research School will then cause a search of the Consolidated List to be carried against the names of the applicant and:

- (a) if the applicant's name, the name of their sponsor, or the name of their bank, or any of their past or present employers, appears on the Consolidated List, the application will be refused; and
- (b) if the applicant's name, the name of their sponsor, or the name of their bank, or the name of any of their past or present employers, does not appear on the Consolidated List, then Manager Admission and Candidature, Griffith Graduate Research School will assess or cause to be assessed whether or not the application involves access to an At Risk School or Research Centre. If the application does not involve access to an At Risk School or Research Centre, Manager Admission and Candidature, Griffith Graduate Research School will cause the application to be processed in the usual manner and comment will be provided on the Application Evaluation Comments section of the online approval process that assessment has been completed. HDR Admissions and Candidature will update the shared spreadsheet for reference by the Dean GGRS. If the application does involve access to an At Risk School or Research Centre, Manager Admission and Candidature, Griffith Graduate Research School will refer to the proposed research project supervisor for assessment in accordance with sections 3.2 to 3.4 of this Policy.

3.2 Proposed supervisor's review

The sanction assessment process will run in parallel to the candidature assessment process. Upon receipt of referral of an application from Manager Admission and Candidature, Griffith Graduate Research School for assessment against applicable sanctions, the relevant HDR Convenor must conduct or cause the proposed supervisor to conduct a preliminary risk assessment by first determining if the underlying topic has any military application and then, if no, then conducting a search of the technical elements of the topic at the Defence and Strategic Goods List online search tool at <https://dsgl.defence.gov.au/Pages/Search.aspx>. If the underlying topic has no military application and none of the technical elements of the topic are listed on the Defence and Strategic Goods List, then the HDR Convenor may indicate in completing their recommendation on the online approval process that this assessment has been conducted. If the underlying topic has a military application or if a technical element of the topic is listed on the Defence and Strategic Goods List, then the relevant HDR convenor must cause the proposed supervisor to:

- (a) download the latest version of the Sanctions Compliance Form from the Sanctions Portal;
- (b) assess the application against the Sanctions Compliance Form as being Low Risk, Medium Risk or High Risk in accordance with the Risk Matrix and decide which of the consequent outcomes listed in the Risk Matrix are considered appropriate for the application;
- (c) complete and sign the Sanctions Compliance Form; and
- (d) then do any of the following:
 - i. refer the completed and signed Sanctions Compliance Form to the appropriate Group Dean (Research) with the recommended outcome from those listed against the relevant designation in the Risk Matrix; or
 - ii. if the application has been assessed as Medium Risk or High Risk and the recommendation is to request modification or further modification of the research proposal to facilitate the application being assessed as low risk, refer the application to the Group Dean (Research) for consideration about modification of the research project. If the applicant is prepared to proceed on the basis of the modified research project then the application will be dealt with in accordance with sections 3.2 to 3.4 of this Policy.

Where there is more than one supervisor proposed for a project, they will undertake the above process collaboratively and the principal supervisor will sign the Sanctions Compliance Form on behalf of all of the supervisors.

3.3 Group Sanctions Review Panel

Upon receipt of a completed and signed Sanctions Compliance Form given under section 3.2(d)(i), the Group Dean (Research) will convene, form and chair a Group Sanctions Review Panel comprised of the relevant Head of School and/or other designees selected by the Dean (Research) versed in the subject matter of the proposed research proposal. The Group

Sanctions Review Panel may meet and deliberate in any manner the members of the panel see fit. The Group Sanctions Review Panel will review the completed and signed Sanctions Compliance Form and either verify the proposed supervisor's assessment or, at their discretion and after consulting with the proposed supervisor, modify the supervisor's assessment to one that they consider is more appropriate. The Group Sanctions Review Panel will also either consider and then verify or modify the supervisor's recommendation in a like manner. Their assessment together with their recommended outcome will be dealt with in the following manner:

- (a) The assessment and recommended outcome will be entered on the Group component of the GGRS Spreadsheet of Relevant Applications by HDR Admissions and Candidature and will be referred to Dean GGRS by the Group Sanctions Review Panel;
- (b) Dean GGRS will then, taking into account the Group Sanctions Review Panel's assessment, determine which of the rankings listed in Annexure A is applicable to the application and which of the outcomes listed in Annexure A is applicable to the application;
- (c) Dean GGRS will notify the relevant Group Dean (Research) if Dean GGRS's risk assessment or proposed outcome differs from the Group Sanctions Review Panel's determination; and
- (d) Manager Admission and Candidature, Griffith Graduate Research School will implement Dean GGRS's recommendations.

3.4 Failsafe Review

As a component of the candidature recommendation process undertaken pursuant to the Higher Degree Research Policy, the Dean (Research) must sign off to Dean GGRS that all recommended candidates for the relevant Academic Group have been assessed for sanctions risk. Dean GGRS, in signing off on the list all candidates for admission under the Higher Degree Research Policy will also conduct a failsafe review of the list (or cause such a review to be conducted) and will flag any application which appears to be an Assessable HDR Application but not an Assessed HDR Application.

4. THE PROCESS – OTHER RELEVANT PROGRAMS

4.1 Context

It is acknowledged that it will be unlikely but possible for research conducted at an honours or masters level to involve research at such an advanced level as to constitute supply of sanctioned technology or services to the student, to be research involving access to high risk equipment and materials or access to DSGL items or technologies or technologies that are related in any manner to weapons of mass destruction.

4.2 Assessment Process

All Assessable Other Program Applications will be subject to assessment in the following manner, namely:

- (a) Manager International Admissions will cause a search of the Consolidated List to be carried against the names of any relevant applicant identified as a citizen of a sanctioned country; and
 - i. if the applicant's name, the name of their sponsor or the name of any of their past or present employers appears on the Consolidated List, the application will be refused; and
 - ii. if the applicant's name, sponsor or past/present employer does not appear on the Consolidated List, the Manager International Admissions will assess or cause to be assessed whether or not the application involves access to an At Risk School or Research Centre. If the application does not involve access to an At Risk School or Research Centre, Manager International Admissions will cause the application to be processed in the usual manner, update the GI Spreadsheet of

Relevant Applications, and inform the Associate Director International Administration that this has been done. If the application does involve access to an At Risk School or Research Centre, Manager International Admissions will refer the application to the Program Convenor for assessment in accordance with sections 3.2 to 3.4 of this Policy, except:

- Manager, International Admissions will assume the roles designated as the responsibility of the Manager Admission and Candidature, Griffith Graduate Research School ;
 - Associate Director, International Administration will assume the roles designated as the responsibility of the Dean GGRS;
 - the relevant Program Convenor will assume the roles designated as the responsibility of the proposed supervisor;
 - Details will be entered into the GI Spreadsheet of Relevant Applications; and
- (b) The Program Convenor may request a dissertation topic in advance to facilitate the assessment described above. If no dissertation topic is able to be provided in the circumstances, the Program Convenor must conduct the assessment on the Program Convenor's view of the likely dissertation topic and must conduct a further assessment when the dissertation topic is decided.
- (c) Any application to be referred to DFAT through the Online Sanctions Administration System for permitting consideration must be directed to Dean GGRS for processing of the relevant application.

5. APPEALS AND UPDATES

Grievances and appeals relating to this process must:

- (a) if brought by a student or applicant, be dealt with in accordance with the [Student Complaints Policy](#) and [Student Complaints Procedures](#);
- (b) if brought by a member of staff and if relating to an application for an HDR Program, must be brought to the Senior Deputy Vice Chancellor; and
- (c) if brought by a member of staff and if relating to an application for an Other Relevant Program, must be brought to the Vice President (Global).

ANNEXURE A: RISK MATRIX

Ranking	Outcome
<p>Low Risk: being that no aspect of the research proposed to be conducted involves supply of sanctioned technology or services to the student 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.</p>	<p>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</p>
<p>Medium Risk: being that 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.</p>	<p>Any of the following or any combination of the following outcomes, namely:</p> <ul style="list-style-type: none"> • Acceptance of the application/approval of the research, subject to satisfaction of all other requirements of the University; • Request modification or further modification of the research proposal to facilitate the application being assessed as low risk and then re-assess the application; • Reject the application on the grounds that it exposes the university to unacceptable risk of Australian Sanctions; • Request further details and reassess the application in light of those details; or • 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).
<p>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.</p>	<ul style="list-style-type: none"> • Request modification or further modification of the research proposal to facilitate the application/proposal being assessed as low risk and then assess; or • Reject the application on the grounds that it exposes the university to unacceptable risk of Australian Sanctions; or • 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

Ranking	Outcome
	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).

ANNEXURE B: DEFINITIONS USED IN THIS PROCESS

"**Academic Group**" means the highest level of academic organisational unit of the University as designated by the University from time to time, including each of the Offices of the Pro Vice Chancellor of:

- a) Arts, Education and Law;
- b) Business;
- c) Health; and
- d) Griffith Sciences.

"**Assessable HDR Applications**" means an application by a prospective international student for an HDR Program supervised in an At Risk Element (and includes applications for changes of research topic made by a student enrolled through an Assessed HDR Application).

"**Assessable Other Relevant Program Applications**" means an application by a prospective international student for enrolment in an Other Relevant Program supervised in an At Risk Element (and includes applications for changes of research topic made by a student enrolled through an Assessed Other Relevant Program Application).

"**Assessed HDR Applications**" means each application referred for assessment pursuant to sections 3.2 to 3.4.

"**Assessed Other Relevant Program Applications**" means each application referred to the proposed supervisor for assessment pursuant to section 4.

"**At Risk Elements**" means an academic organisational unit of the University identified as such from time to time in the At Risk Element List.

"**At Risk Elements List**" means the then current list kept by the Senior Deputy Vice Chancellor pursuant to section 2.1(c) of this Policy.

"**Australian Sanctions**" means *Autonomous Sanctions Act 2011*, the *Defence Trade Controls Act 2012*, the *United Nations Act 1945* or the *Weapons of Mass Destruction (Prevention of Proliferation) Act 1995* and any other sanctions from time to time in force in accordance with the laws of the Commonwealth of Australia ("Australian Sanctions").

"**Element**" means any school, faculty, or department within an Academic Group and includes all Griffith University Research Centres (as defined in Section 2.0 of the University's Research Centres and Institutes Policy) and colleges, and any Administrative Office within an Administrative Division.

"**Enrol**" "**Enrolled**" or "**Enrolment**" means the act of a Student accepting an offer of admission and registering for courses at the University, by carrying out the specified enrolment procedures of the University.

"**GI Spreadsheet of Relevant Applications**" means a spreadsheet to be kept and maintained by Manager, International Compliance of all Other Relevant Program Applications from prospective international students from countries subject to Australian Sanctions.

"**GGRS Spreadsheet of Relevant Applications**" means a spreadsheet to be kept and maintained by Dean, GGRS of all Other HDR Applications from prospective international students from countries subject to Australian Sanctions.

"**HDR Program**" means a program described in section 2 of the Higher Degree Research Policy.

"**Other Relevant Program**" means postgraduate programs that involve a significant research component but are not an HDR Program, such as Masters research programs and Honours research programs.

"**Risk Matrix Table**" means the table in Annexure A.

"**Sanctions Compliance Form**" means the form so called and made available through the Sanctions Portal by the Senior Deputy Vice Chancellor, as updated from time to time.

"**Sanctions Portal**" means the intranet site caused to be kept and kept up to date by the Senior Deputy Vice Chancellor pursuant to section 2.1(a) of this Policy