

## Foreign Engagement Compliance Obligations in brief

	Foreign Arrangements Scheme	Foreign Influence Transparency Scheme	Foreign interference	Defence Trade Controls	Sanctions
<b>Basically about</b>	<b>Registering engagement activities</b>		<b>Reducing risk</b>	<b>Avoiding prohibited transactions</b>	
<b>Intent</b> <i>To ensure international engagement activities...</i>	<i>are consistent with Australia's foreign policy and national interest</i>	<i>that aim to influence Australian decision-makers are open and transparent</i>	<i>that may compromise the national interest are recognised and prevented</i>	<i>will meet obligations set by the Defence Trade Co-operation Treaty with the US</i>	<i>accord with obligations under UN and Australian sanctions laws</i>
<b>Compliance type</b>	Assess & notify	Assess & notify	Risk management	Assess & comply	Assess & comply
<b>University obligations</b>	→ Register certain international arrangements with Government	→ Register certain foreign relationships/influence activities with Government	Reduce & prevent foreign interference by enhancing: governance; due diligence; internal communication; knowledge sharing; cyber security.	Check & ensure listed goods and technologies are exported only where permitted	Check & ensure engagement or transactions are not conducted with sanctioned individuals, organisations or countries
<b>Staff obligations</b>	Complete <a href="#">Foreign Arrangement Assessment</a> → Due diligence assessment → Global Engagement informed of all relevant arrangements	Complete <a href="#">Foreign Engagement Compliance Review</a> → <a href="#">FITS Registration Assessment Form</a> → Evidence of FITS compliance → CSO approval	Culture and systems improvement led by Office of the Chief Security Officer / Defence & Security Committee → Individual integrity & accountability	Complete <a href="#">Foreign Engagement Compliance Review</a> . Assistance from Office of Research Ethics, Compliance and Integrity	Assistance from Office of Research Ethics, Compliance, and Integrity / Foreign Engagement Compliance Review / HR / Student Administration / AGC
<b>University resources</b>	<a href="#">Information Form</a>	<a href="#">Information Form</a>	<a href="#">Information Form</a>	<a href="#">Information Form</a>	<a href="#">Information Form</a>
<b>External Process</b>	The University registers arrangements with Government	On advice, individuals (or units) register relationships/activities with Government	Ensure University practices are in line with <a href="#">Guidelines to Counter Foreign Interference in the Australian University Sector</a>	Department provides advice/permits/exemptions as required	Department provides advice/permits/exemptions as required
<b>Lead Government Department / Resources</b>	<a href="#">Foreign Affairs and Trade</a>	<a href="#">Attorney General</a>	<a href="#">Office of National Intelligence / Education, Skills &amp; Employment</a>	<a href="#">Defence</a>	<a href="#">Foreign Affairs and Trade</a>
<b>Liability</b>	University	Individuals/University	Individuals	Individuals	Individuals/University
<b>Penalties</b>	Court injunction	Gaol: 5 years	Gaol: 10–20 years	Gaol: 10 years / Fine \$500k	Gaol: 10 years/ Fine \$.5-\$2M