

Foreign Engagement Compliance Obligations in brief

	Foreign Arrangements Scheme	Foreign Influence Transparency Scheme	Foreign interference	Defence Trade Controls	Sanctions
Basically about	Registering engagement activities		Reducing risk	Avoiding prohibited transactions	
Intent To ensure international engagement activities...	<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>
Compliance type	Assess & notify	Assess & notify	Risk management	Assess & comply	Assess & comply
What we need to do	Register certain international arrangements with Government → <i>Foreign Arrangement Scheme</i>	Register certain foreign relationships/influence activities with Government → <i>Foreign Influence Transparency Scheme</i>	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
Responsibility	University	Individuals/University	Individuals	Individuals	Individuals/University
Initial internal process	Complete <i>Foreign Engagement Compliance Review</i> → Due diligence assessment → Global Engagement or Innovation and Commercialisation Services through Research Services (as applicable) to notify relevant arrangements	Complete <i>Foreign Engagement Compliance Review</i> → CSO review → Referral for FITS advice	Culture and systems improvement led by Office of the Chief Security Officer / Defence & Security Committee → Individual integrity & accountability	Complete <i>Foreign Engagement Compliance Review</i> Assistance available 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
University resources	<ul style="list-style-type: none"> Information Form 	<ul style="list-style-type: none"> Information Form 	<ul style="list-style-type: none"> Information Form 	<ul style="list-style-type: none"> Information Form 	<ul style="list-style-type: none"> Information Form
External Process	The University registers arrangements with Government	On advice, individuals (or units) register relationships/activities with Government	Ensure University practices are in line with Guidelines to Counter Foreign Interference in the Australian University Sector	Department provides advice/permits/ exemptions as required	Department provides advice/permits/ exemptions as required
Lead Government department / resources	Foreign Affairs and Trade	Attorney General	Office of National Intelligence / Education, Skills & Employment	Defence	Foreign Affairs and Trade
Penalties	Court injunction	Gaol: 5 years	Gaol: 10–20 years	Gaol: 10 years / Fine \$500k	Gaol: 10 years/ Fine \$.5-\$2M
Legislation	Australia's Foreign Relations (State and Territory Arrangements) Act 2020	Foreign Influence Transparency Scheme Act 2018	Criminal Code Act 1995	Defence Trade Controls Act 2012	Autonomous Sanctions Act 2011 Charter of the United Nations Act 1945