



International Engagement Policy

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OVERVIEW

The International Engagement Policy outlines the principles that underpin the University's International Collaboration, being collaboration with International Institutions and International Individuals with the aim of enhancing mutual learning, teaching, research and innovation.

The aims of the Policy are to:

- develop and maintain productive and sustainable international partnerships that deliver against University objectives;
- ensure that associated value and risks are assessed and managed appropriately, and
- provide procedures as to how to develop, assess, establish, monitor and review agreements with International Institutions and International Individuals.

SCOPE AND APPLICATION

This Policy applies to all International Collaborations.

All University Personnel engaged in the development and maintenance of International Collaborations are required to comply with this Policy.

Implementation of this Policy will be carried out in accordance with the University's Code of Conduct and the Academic Board Statement on Undue Influence. Any attempts to exert pressure improperly or influence actions or decisions made pursuant to this Policy must be reported in accordance with the [Fraud and Corruption Control Policy](#) and registered according to relevant Australia's foreign compliance regulations.

This Policy is to be read in conjunction with the [Contracts and Agreements Policy](#) and other relevant policies, procedures and legislation set out in Procedure 3.

POLICY PRINCIPLES

The University will ensure, in developing and establishing International Collaborations, that each collaboration:

- Supports and embodies the University's [mission and focus](#) and [values](#).
- Aligns with the strategic directions and priorities of the University.
- Aligns with all Australian and relevant international legislative and regulatory requirements.
- Is only with suitable and reputable Collaborators.

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5. Enhances and does not pose an unacceptable or inappropriate risk to the University's reputation, operations or relationships.
 6. Creates value and, when applicable, provides a positive return for the University.
 7. Adds value to the University's existing network of International Institutions and International Individuals.
 8. Is endorsed by the Head of the relevant Proponent Area.
 9. Is governed, where applicable, by formal agreements which:
 - a) are approved and signed in accordance with the University's governance framework and delegations as set in the [Authority Register](#);
 - b) clearly articulate the rights, responsibilities and obligations of the parties and are readily capable of being operationalised;
 - c) have a specified duration of no longer than five-years unless the business case strongly supports a longer term; and
 - d) are reviewed and monitored for continuing relevance and impact on the University's activities.

PROCEDURES

1. Due Diligence

Where a potential International Collaboration is identified, the Proponent must:

- a) conduct appropriate Due Diligence to ensure that the intended collaboration meets the Policy principles;
- b) consult with the Proponent Area to assess the viability of the proposed collaboration, whether a formal agreement is required and, if so, what type of formal agreement would be suitable. For the avoidance of doubt, a formal agreement is required under this policy when it is a type of agreement, identified in the second column of the table in Procedure 3, or it supports an International Collaboration, identified in that column. In all other circumstances, a proposed collaboration may be documented informally such as by email exchange or phone conversations. Notwithstanding informal documentation, such collaborations must still comply with Procedures 1a, 2 and 7; and Procedures 4 and 5 as applicable.

2. Foreign Engagement Compliance Review

Unless the potential International Collaboration is listed in Annex 1, the Proponent must:

- a) complete a submission detailing the collaboration for a University's [Foreign Engagement Compliance Review](#) (FECR) which includes determination of whether:
 - i. the intended Collaborator is a Foreign Principal for the purposes of the [Foreign Influence Transparency Scheme Act 2018](#) (FITS Act) and the arrangement involves a Registrable Activity as defined in the FITS Act (FITS Arrangement), and therefore must be registered under the [Foreign Influence Transparency Scheme](#) (FITS);
 - ii. the intended Collaborator is a Foreign Entity for the purposes of the [Australia's Foreign Relations \(State and Territory Arrangements\) Act 2020](#) (Foreign Relations Act) and the arrangement is a foreign arrangement as defined in the Foreign Relations Act (FAS Arrangement), and therefore must be notified under the [Foreign Arrangement Scheme](#) (FAS).
- b) not proceed with the collaboration unless endorsement to proceed has been received through the FECR.

3. Formalisation of collaboration through an agreement

If the intended collaboration requires a formal agreement, the Proponent must consult with the Processing Area and follow the relevant procedures as indicated below.

Category	Types of Agreement and International Collaborations requiring formal agreements	Processing Area	Policy / Procedure to follow:
1	<ul style="list-style-type: none"> Memorandum of Understanding (except research-only) Letter of Intent Student and Staff Exchanges Pathways (credit transfer, articulations, master qualifying, dual awards) Sponsorships Study tours All other International Collaboration not included in Categories 2 to 11 	Global Engagement	International Agreements Procedures (annexed)
2	<ul style="list-style-type: none"> Transnational Education (TNE) 	Global Engagement	Transnational Education Policy
3	<ul style="list-style-type: none"> Jointly conferred academic (coursework) Award 	Global Engagement	Jointly Conferred Coursework Awards Policy
4	<ul style="list-style-type: none"> Workplace based learning <ul style="list-style-type: none"> Internships Student placements 	<ul style="list-style-type: none"> DASE Internships Faculty placements 	Coursework Academic Programs Policy
	<ul style="list-style-type: none"> HDR internships 	<ul style="list-style-type: none"> Adelaide Graduate Centre HDR internships 	Contact: Adelaide Graduate Centre
5	<ul style="list-style-type: none"> Recruitment agents 	Marketing and Recruitment	<i>Agency Agreements Policy under development</i>
6	<ul style="list-style-type: none"> Gifts and sponsorships to the University Outgoing contributions and sponsorships programs supported by the University 	<ul style="list-style-type: none"> Advancement Marketing and Recruitment 	<ul style="list-style-type: none"> Giving Policy Outgoing Sponsorship Policy
7	<ul style="list-style-type: none"> Jointly conferred academic (Higher Degree by Research) Award, including cotutelles 	Adelaide Graduate Centre	Jointly Conferred Higher Degree by Research (HDR) Awards Policy
8	<ul style="list-style-type: none"> Research contracts Competitive and non-competitive research grant agreements Other associated research agreements 	Research Services	Research Grants, Contracts and Consultancies Policy
9	<ul style="list-style-type: none"> Consultancy services 	Innovation and Commercialisation Services	Research Grants, Contracts and Consultancies Policy
10	<ul style="list-style-type: none"> Protection and commercialisation of intellectual property 	Innovation and Commercialisation Services	Intellectual Property Policy

11	<ul style="list-style-type: none"> ○ Memorandum of Understanding (research-only) ○ Any other collaboration not included in Categories 1 to 10 which is research-only related 	Division of Research and Innovation	Contact: Office of the Deputy Vice-Chancellor and Vice-President Research
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4. Registration of collaboration

Where the Collaborator is a Foreign Principal and the Arrangement involves a Registrable Activity as defined in the *Foreign Influence Transparency Scheme Act 2018*, the Proponent will coordinate with the Chief Security Officer within the Division of Research and Innovation to inform Global Engagement so that FITS Registration occurs.

5. Notification of collaboration

- a) Where the International Collaboration is a FAS Arrangement, Global Engagement or Research Services (as applicable) will submit a FAS Notification to the Minister for Foreign Affairs on behalf of the University.

FAS Notification is required:

- i. Upon the University deciding to enter into, renew or amend a FAS Arrangement. When the Proposal has been approved by the relevant delegation holder, Global Engagement or Research Services (as applicable) will submit the first FAS Notification with the relevant supporting documentation (e.g., draft agreement).
 - ii. Once the FAS Arrangement has been signed or accepted by all parties, Global Engagement or Research Services (as applicable) will submit the second FAS Notification with a copy of the fully executed (signed and dated) agreement as supporting documentation. The notification must be submitted within 14 calendar days from the date of signing.
- b) Where the International Collaboration includes a “core State/Territory entity” under the FAS, the University must ensure the “core State/Territory entity”, has received approval from the Minister for Foreign Affairs before negotiating or entering into a FAS Arrangement.

6. Recordkeeping

For all International Collaborations formalised through agreements:

- a) Communications with internal and external stakeholders around negotiations of the agreement are required to be recorded in accordance with the University’s [Information Management Policy](#) and [Contracts and Agreements Policy](#).
- b) Once the agreement has been signed by all parties, the Processing Area must ensure that a fully executed version is lodged as a “Legal Document” with Records Services and record the details in the local Approved Contract Register in accordance with the [Contracts and Agreements Policy](#).

7. Monitoring and review

All International Collaborations formalised through agreements are subject to regular review in accordance with the relevant Policies / Procedures as indicated in Procedure 3 of this Policy.

For International Collaborations that do not require formal agreements, Proponents must ensure that their collaboration continues to be aligned with the Policy Principles.

8. Variation, extension, renewal and termination

Variation, extension, renewal and termination of International Collaborations formalised through agreements must follow the relevant Policies / Procedures as indicated in Procedure 3 of this Policy.

AUTHORITIES

Authorities relate to agreements and agreements related to International Collaboration noted in categories 1 and 11 of the Table included in Procedure 3. Authorities for agreements in categories 2 to 10 are included in the relevant Policies as indicated in the Table.

Where agreements contain a financial delegation component, the delegation holder must escalate to their line-manager any agreements that fall outside their financial delegation limits.

Authority Category	Delegation Holder Authority and Limits	
	Approval	Signing
Key: Academic International agreements with education institutions, government and non-government institutions and organisations (excluding international research-only agreements)	Vice-Chancellor and President or Deputy Vice-Chancellor and Vice-President (External Engagement) Limits Council approval required for a major strategic initiative or a significant commercial activity as per section 9(1)(b) and (h) of the University of Adelaide Act 1971. Deputy Vice-Chancellor and Vice-President (Research) approval required if research is involved.	Vice-Chancellor and President or Deputy Vice-Chancellor and Vice-President (External Engagement)
Key: Research Research-only international agreements (including MoUs) with education institutions, government and non-government institutions and organisations	Vice-Chancellor and President or Deputy Vice-Chancellor and Vice-President (Research) Limits Council approval required for a major strategic initiative or a significant commercial activity as per section 9(1)(b) and (h) of the University of Adelaide Act 1971.	Vice-Chancellor and President or Deputy Vice-Chancellor and Vice-President (Research)
Key: Sponsorships Agreements for Sponsorships of international students	Deputy Vice-Chancellor and Vice-President (External Engagement) Limits Dean of Graduate Studies approval required if HDR international students are included	Deputy Vice-Chancellor and Vice-President (External Engagement)

Key: Academic Agreements with international non-university organisations and third-party providers of services to facilitate students' short-term study tours	Head of Academic and administrative units	Head of Academic and administrative units according to financial delegations
Key: Academic Agreements for the delivery of English Language services	General Manager, English Language Centre	General Manager, English Language Centre according to financial delegations

DEFINITIONS

Approved Contract Register means the central contract register maintained by Legal and Risk Branch and available for use by academic and administrative units, and any alternative database or register (which may be an Excel spreadsheet) approved by Legal and Risk Branch in accordance with the Contracts and Agreements Policy.

Collaborator refers to an International Individual and/or International Institution with which the University intends to engage in International Collaboration.

Core Foreign Arrangement as defined in section 10(2) of Australia's *Foreign Relations (State and Territory Arrangements) Act 2020* and, for the purposes of the FAS, is an Arrangement between a core State/Territory entity; and a core foreign entity; whether or not other entities are also a party to the arrangement. Core Foreign Arrangements must be notified by the core State/Territory and require approval from the Minister for Foreign Affairs before being negotiated or entered into.

Core State/Territory entity as defined in section 7 of the Australia's *Foreign Relations (State and Territory Arrangements) Act 2020* and, for the purposes of the FAS, is any of the following entities:

- (a) a State or Territory;
- (b) the government of a State or Territory;
- (c) a Department or agency (however described) that is part of an entity covered by paragraph (a) or (b);
- (d) a body established for the purposes of local government by, or under a law of a State or a Territory;
- (e) a university established by, or under, a law of a State or a Territory;
- (f) an entity that is prescribed by the rules to be a State/Territory entity;

but does not include:

- (g) a corporation that operates on a commercial basis; or
- (h) a hospital; or
- (i) an entity that is prescribed by the rules as not being a State/Territory entity.

Paragraphs (a) to (f) do not limit each other.

Delegation Holder refers to the University staff member with authority to approve a Proposal, sign International Agreements and approve renewal or variation to International Agreements.

Due Diligence refers to the process where all reasonable steps are taken to obtain relevant information that will help reduce the risk of making an uninformed decision.

FAS Arrangement, as defined in section 9(1) of Australia's *Foreign Relations (State and Territory Arrangements) Act 2020* and, for the purposes of the FAS, includes any written arrangement, agreement, contract, understanding or undertaking whether or not it is legally binding entered into with a Foreign Entity.

FAS Notification refers to the submission of information to the Department of Foreign Affairs and Trade (DFAT) whenever an International Collaboration is a FAS Arrangement with a Foreign Entity.

FITS Arrangement, as defined in section 10 of the *Foreign Influence Transparency Scheme Act 2018*, refers to contract, agreement, understanding or other arrangement of any kind, whether written or unwritten.

FITS Registration, refers to the obligation to register with the Commonwealth Attorney-General's Department a Registrable Activity within 14 days of either entering into a relationship with a Foreign Principal or

undertaking a Registrable Activity on behalf of a Foreign Principal. Registrations need to be renewed every 12 months if the registrant continues to undertake any Registrable Activity for a Foreign Principal.

Foreign Entity, as defined in section 8 of *Australia's Foreign Relations (State and Territory Arrangements) Act 2020* and, for the purposes of the FAS, it includes foreign governments as well as universities that are located in a foreign country and lack institutional autonomy.

Foreign Principal, as defined in section 10 of the *Foreign Influence Transparency Scheme Act 2018*, refers to foreign governments, foreign political organisations, foreign government-related entities and foreign government related individuals.

International Agreement refers to a formal document recognising the establishment of a relationship between the University and an International Institution or International Individual for (a) learning, teaching and/or (b) research and innovation activities.

International Collaboration refers to any type of collaboration, whether written or unwritten, with International Institutions or International Individuals.

International Individual means a natural person who is either a citizen or permanent resident of a country other than Australia, and includes a person with dual citizenship.

International Institution, refers to foreign governments, foreign political organisations, foreign government-related entities as well as organisations or corporations that are not governed exclusively by the laws of Australia and, for the purpose of this Policy, includes Australian based branches and agencies of International Institutions.

International Partner refers to International Individuals and International Institutions with which the University has signed an International Agreement.

Memorandum of Understanding (MoU) is an over-arching high-level agreement that reflects the University's intention to collaborate with another entity (or entities) without yet committing to specific activities, projects or programs, resource inputs or outcomes. An MoU is used to formalise a relationship, and provides the opportunity to explore potential collaborations of mutual benefit.

Processing Area refers to the University's area responsible for overseeing the drafting, signing and recordkeeping of establishment, renewal and variation of an International Agreement.

Proponent refers to the University staff member proposing an International Collaboration.

Proponent Area refers to the University's Division, Faculty, School, Branch, Institute or Centre in which the Proponent works.

Proposal refers to the document prepared by a Proponent to seek endorsement for the establishment, renewal or a variation of an International Agreement.

Registrable Activity, as defined in sections 20, 21, 22 and 23 of the *Foreign Influence Transparency Scheme Act*, refers to an activity undertaken on behalf of any individual or organisation that is identified as a Foreign Principal or at the request of a Foreign Principal.

University Personnel refers to the University officers, employees, titleholders and contractors.

RMO File No.	F. 2020/13572
Policy Custodian	Deputy Vice-Chancellor and Vice-President (External Engagement)
Responsible policy officer	Executive Director, Global Engagement
Endorsed by	Vice-Chancellor's Executive on 2 February 2022
Approved by	Vice-Chancellor and President on 10 March 2022

Related Documents and Policies	University of Adelaide Act 1971 Contracts and Agreements Policy Risk Management Policy Information Management Policy Academic Credit Arrangements Policy Coursework Academic Programs Policy Transnational Education Policy Research Grants, Contracts and Consultancies Policy Jointly Conferred Higher Degree by Research (HDR) Awards Policy Jointly Conferred Coursework Awards Policy Fees for Award Programs and Courses Policy Giving Policy Outgoing Sponsorships Policy Travel and Entertainment Policy and Procedures
Related Legislation	Higher Education Standards Framework (Threshold Standards) 2015 Higher Education Provider Guidelines Australian Qualifications Framework National Code of Practice for Providers of Education and Training to Overseas Students 2018 Education Services for Overseas Students Act 2000 (ESOS Act) Tertiary Education Quality and Standards Agency Act 2011 Guidance to Counter Foreign Interference in the Australian University Sector Foreign Relations (State and Territory Arrangements) Act 2020 Foreign Influence Transparency Scheme Act 2018 Defence Trade Control Act 2012 Autonomous Sanctions Act 2011
Superseded Policies	International Agreements Policy (11 April 2018)
Effective from	10 March 2022
Review Date	9 March 2025
Contact for queries about the policy	Executive Director, Global Engagement globalengagement@adelaide.edu.au

**International Collaboration for which completion
of a Foreign Engagement Compliance Review (FECR)
is not required**

Travel	International travel that has been approved through the Travel and Entertainment Policy and Procedures
Co-supervision	<p>Co-supervision of a student at a foreign institution unless the activity relates to one of the following areas of concern:</p> <ol style="list-style-type: none"> 1) International Sanctions 2) Defence dual use technology / sensitive technology 3) Staff member receives or will receive benefits (e.g. travel expenses paid for, honorarium received) that exceed \$500. <p>Note: All gifts or benefits, including financial benefits not otherwise administered by the University, (e.g. travel expenses paid by a third party, receipt of honorarium) should be disclosed and/or managed under the University's Conflict of Interest Procedure. Gifts valued of over \$250 must be disclosed to the supervisor/manager. Gifts and benefits with a value in excess of \$500 must be disclosed and approved on the Conflict of Interest form.</p>
Individual conference participation	<p>Staff participation at international conferences that has received travel approval unless the activity relates to one of the following areas of concern:</p> <ol style="list-style-type: none"> 1) Export of Defence dual use technology / sensitive technology 2) Staff member receives or will receive benefits (e.g. travel expenses paid for, honorarium received) that exceed \$500. <p>Note: All gifts or benefits, including financial benefits not otherwise administered by the University, (e.g. travel expenses paid by a third party, receipt of honorarium) should be disclosed and/or managed under the University's Conflict of Interest Procedure. Gifts valued of over \$250 must be disclosed to the supervisor/manager. Gifts and benefits with a value in excess of \$500 must be disclosed and approved on the Conflict of Interest form.</p>
Individual academic output (papers, guest lectures)	<p>Collaboration at the individual level on academic output such as the co-authoring of papers with international colleagues or presenting a guest lecture to an international audience unless the activity relates to one of the following areas of concern:</p> <ol style="list-style-type: none"> 1) Export of Defence dual use technology / sensitive technology 2) Staff member receives or will receive benefits (e.g. travel expenses paid for, honorarium received) that exceed \$500. <p>Note: All gifts or benefits, including financial benefits not otherwise administered by the University, (e.g. travel expenses paid by a third party, receipt of honorarium) should be disclosed and/or managed under the University's Conflict of Interest Procedure. Gifts valued of over \$250 must be disclosed to the supervisor/manager. Gifts and benefits with a value in excess of \$500 must be disclosed and approved on the Conflict of Interest form.</p>
Online international learning and teaching activities	<p>International collaboration to deliver courses or elements of courses online, including online presentation of guest lectures, collaborative online learning projects for students, joint 'virtual' classrooms, etc., unless the activity relates to one of the following areas of concern:</p> <ol style="list-style-type: none"> 1) Export of Defence dual use technology / sensitive technology 2) Staff member receives or will receive benefits (e.g. travel expenses paid for, honorarium received) that exceed \$500.

	<p>Note: All gifts or benefits, including financial benefits not otherwise administered by the University, (e.g. travel expenses paid by a third party, receipt of honorarium) should be disclosed and/or managed under the University's Conflict of Interest Procedure. Gifts valued of over \$250 must be disclosed to the supervisor/manager. Gifts and benefits with a value in excess of \$500 must be disclosed and approved on the Conflict of Interest form.</p>
Visits	<p>Visits as long as they refer to:</p> <ol style="list-style-type: none"> 1) An official international delegation. 2) An informal or "drop-by" visit by foreign individuals already in Australia or coming to Australia only to attend a conference. 3) Visits not facilitated by the University (i.e. not including university commitments towards arranging travel visas and travel logistics, or providing access to resources such as unsupervised access to buildings and/or IT services).
Special Studies Programs (SSP)	<p>Successful applications of University academic staff for SSP as approved by the relevant Executive Dean.</p>