

Trusted Research

What's your role?

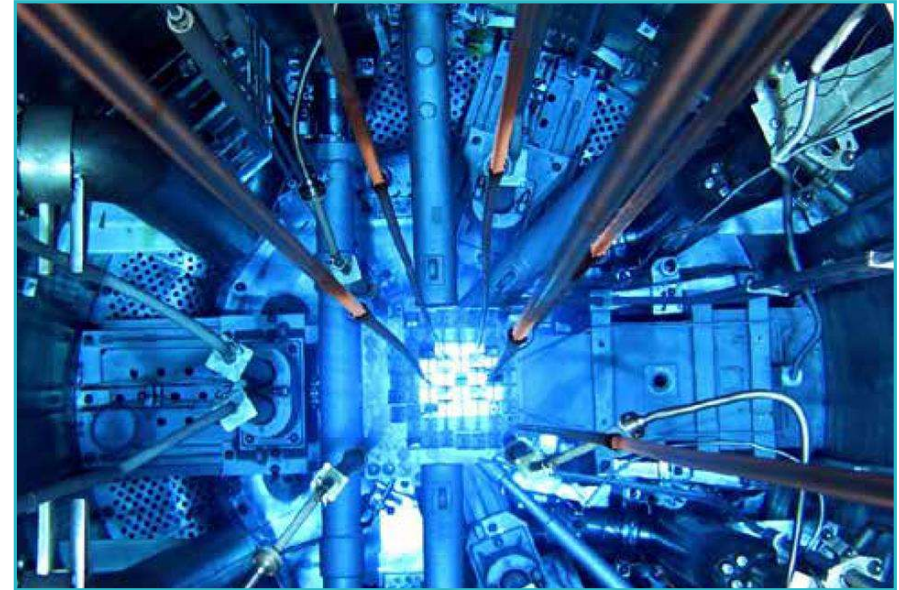
We all have a role to play in managing risks and ensuring compliance:

- **Senior Executive Team:** setting policies, monitoring risks, raising awareness at all levels
- **Overall responsibility:** Stephen Ford, Associate Director for Research Operations
- **Operational responsibility:** Export Controls Manager, currently being recruited
- **Research Leadership (HoS, DoR, Research Deans):** raising awareness, ensuring that researchers follow procedures
- **Researchers:** following procedures

What is Trusted Research?

Protecting the UK's intellectual property, sensitive research, people and infrastructure from potential theft, misuse and exploitation, including as a result of hostile activity by state and other actors.

Applies to research collaborations with originations or partners with links to nations whose democratic or ethical values are different to our own.



What kind of things does this cover?

Examples may include:

- hosting visitors from international universities;
- working with an overseas partner or sponsor;
- sending research results overseas for peer review or presenting them at a conference;
- carrying unpublished research overseas on a laptop or paper, or accessing it from a UK server while overseas;
- exchanging laboratory equipment or materials – even in very small quantities – with overseas collaborators;
- handling sensitive equipment or technology from the US.

What are the risks?

Violations could lead to:

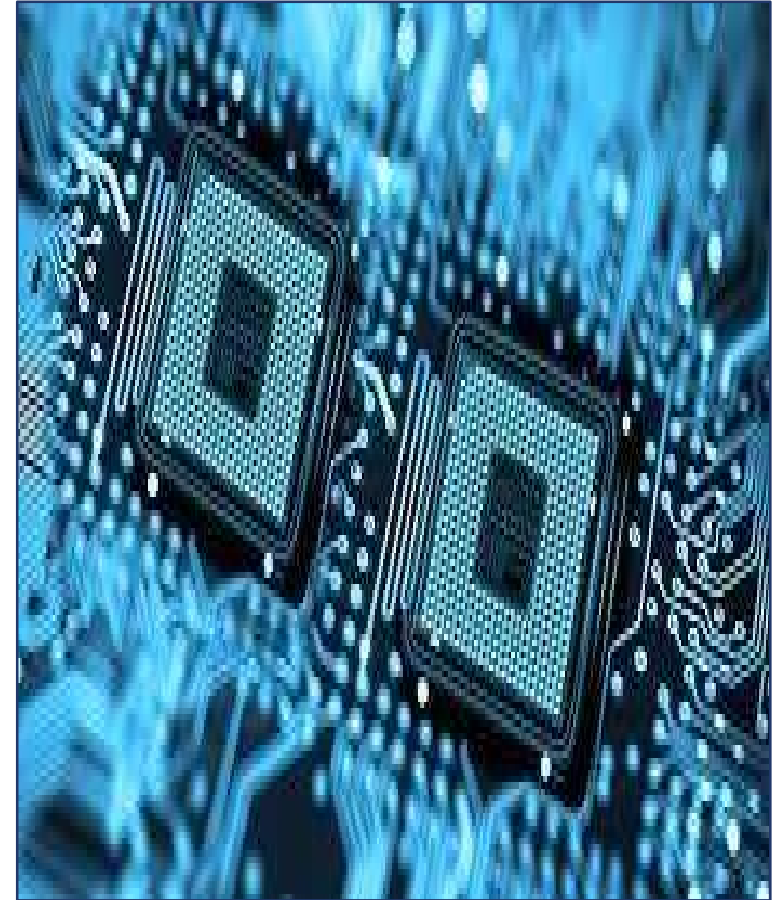
- civil and criminal penalties
- media and political pressure to cut overseas links
- negative impact on research links and numbers of overseas students
- undermine confidence of industry & government partners



Export Controls

Controlled items:

- Equipment
- Components
- Materials and chemicals
- Biological agents
- Software - source and object code
- Technology, data or 'know-how' – i.e. specific information required or necessary for the development, production or use of any controlled hardware or software



What do we mean by export / transfer?

- a) **Physical exports**, permanent or temporary
- b) **Electronic transfers** by email, phone, video conference, online learning, remote teaching downloading or accessing by a person located overseas.
- c) **Hand carrying** controlled software or technology on paper or saved on a laptop, mobile phone or memory device;
- d) **US-controlled items**
- e) **Sanctions**: the transfer of any economic resource to, or for the benefit of, a sanctioned individual or organisation.



What is controlled?

- **‘End Use’** → any item that you have been informed, you know or you have reason to suspect may be used in a WMD programme or prohibited military use
- **Military Use** → any item that has been specially designed or modified for military use
- **Dual-use** → items intended for civil use but which could potentially be used for military, weapons of mass destruction (WMD) or security-related purposes. Check UK Govt [Dual-Use Lists](#).
- **Sanctions** → dealing with sanctioned countries, organisations or individuals. Check UK Govt [Sanctions Lists](#).

Exemptions

- **In the public domain**
 - Must be available without restriction, e.g. open access or subscription anyone could pay for
 - Research is not exempt until after publication. Work intended to be published is not covered.
 - Act of publication not subject to licencing unless technology is otherwise restricted.
- **Patent application**
 - Except for nuclear-dual use technology, controls do not apply to minimum technical information required to support a patent application
- **Basic scientific research**
 - Purely experimental or theoretical work, undertaken solely to obtain new knowledge of the fundamental principles of phenomena or observable facts.
 - It is not directed towards a specific short-term practical aim nor addressing a specific technical problem.
 - It is likely to be basic scientific research if the sole intended output is a published article.
 - TRL 1-2. (TRL 3 needs to be considered case-by-case.)
 - Does not apply to software.

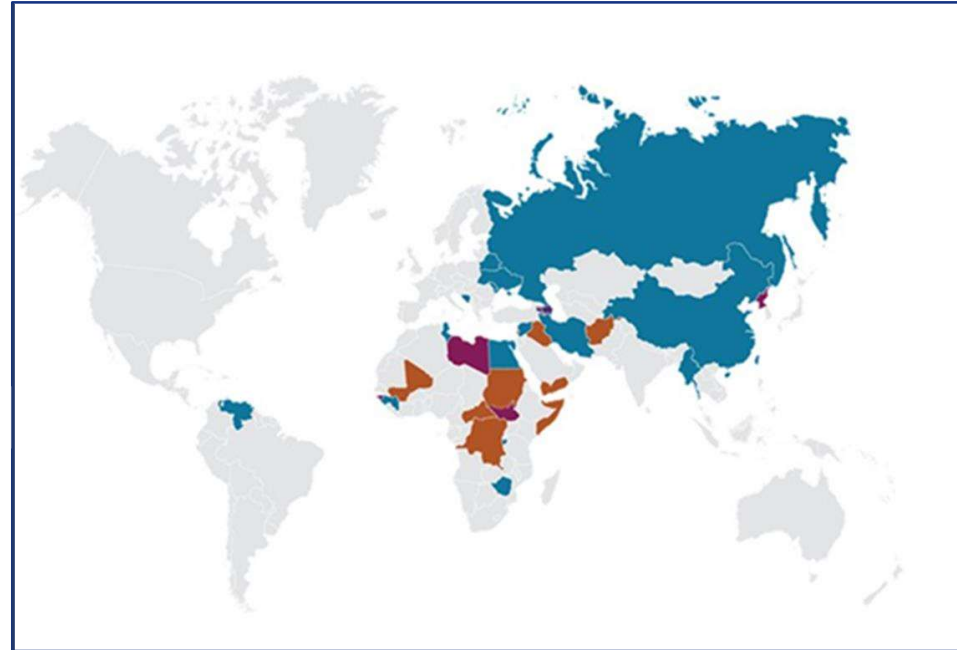
Sanctions

- **Targets are governments, individuals and companies :**
 - Terrorists (e.g. IS, Al Qaida)
 - WMD proliferators (e.g. Iran, North Korea)
 - Conflict (e.g. Syria)
 - Aggression (e.g. Russia)
 - Individuals (e.g. Roman Abramovich)
- **Relevance to Queen Mary:**
 - transfer of technology, hardware or software
 - provision of 'technical assistance'
 - payments to or from sponsors, partners, authors
 - payments to suppliers of goods and services



Sanctioned / Embargoed Countries

- **Most Sensitive Countries:**
 - Cuba, Crimea, Donetsk, Luhansk (territory of Ukraine), Iran, North Korea, Syria, Russia
 - **Highly likely to be impossible to do business**
- **Restricted Countries:**
 - Afghanistan, Argentina, Armenia, Azerbaijan, Belarus, Bosnia-Herzegovina, Burundi, Central African Republic, China (including Hong Kong), Democratic Republic of the Congo, Guinea, Guinea Bissau, Iraq, Lebanon, Libya, Mali, Myanmar (Burma), Nicaragua, Somalia, South Sudan, Sudan, Tunisia, Venezuela, Yemen, Zimbabwe
 - **Due diligence and enhanced due diligence required**
- Check [UK Govt Sanctions list](#)



Sources of help and further advice

- Queen Mary sanctions control and export policy
 - Includes export controls and sanctions flowchart to help guide decision making / flag risks
- Online training module (soon to be available via QM Plus)
- Contact the team:
vp-trustedresearch@qmul.ac.uk



Export Controls and Sanctions Flowchart

