

National Security Procedure

1 Purpose

To set out the processes which guide the University's compliance with Australian national security laws and mitigating risks of Foreign Interference at the University.

2 Scope

This procedure applies to all University Members and Students who engage in any interactions with Foreign Entities. These interactions may involve certain risks or legal obligations related to issues like Foreign Interference, Foreign Influence, Foreign Arrangements, and compliance with the Defence Industry Security Program (DISP), as well as Autonomous Sanctions and Export Controls.

This procedure should be read in conjunction with the University's National Security Policy, Sanctions and Export Controls Procedure, Enterprise Risk Management Policy, and Enterprise Risk Management Procedure.

3 Procedure Overview

The University is committed to proactively managing the threat of Foreign Interference to help safeguard the University, protect Academic Freedom, demonstrate compliance and understanding of national security interests, maintain confidence and support of partnerships and ensure the University can maximise the benefits of education and Research endeavours.

This Procedure assists the University with meeting its obligations under the University Foreign Interference Taskforce (UFIT) Guidelines on Countering Foreign Interference in the Australian University Sector.

National security risks form part of the University's risk management framework. This procedure contains specific guidance for:

- Employee disclosures and Declarations;
- Foreign Interference;
- Foreign Influence;
- The Foreign Arrangements Scheme; and

- the Defence Industry Security Program (DISP).

4 Procedures

The University is committed to proactively managing its Foreign Interactions, in accordance with statutory obligations relating to Foreign Interference, Foreign Influence, Foreign Arrangements, the Defence Industry Security Program (DISP), and Autonomous Sanctions and Export Controls. Risks arising from Foreign Interactions form part of the University's risk management framework and will be managed in accordance with this procedure.

Through partnerships with the University or University Members, some foreign countries, or their proxies, may seek to exploit a collaboration. Working with entities from other countries carries a higher risk of exposure to undue influence or acts that can undermine the University's security and Australia's national interests. To manage this risk, sound due diligence should be undertaken before entering any arrangement with a Foreign Entity. This is a means of providing assurance of transparency and integrity.

The Foreign Interactions in Research Due Diligence Checklist is specific to Research Activities and acts as a first pass under UFIT's Lowest Effective Dose Due Diligence Framework. It enables University Members to undertake an initial risk assessment of proposed activities with foreign partners to identify any red flags that may require a more comprehensive due diligence assessment.

The Foreign Interactions Due Diligence Form provides a more comprehensive due diligence assessment and enables University Members to undertake a risk assessment of proposed activities with Foreign Entities to ensure they do not breach Australia's national security laws. University Members and Students engaging in any activity or partnership on behalf of, or with a Foreign Entity as part of University business, must use this tool to evaluate the proposed activity or partnership, for the risk of Foreign Interference, Foreign Influence and to inform statutory reporting or regulatory obligations.

4.1 Employee Disclosures and Declarations

University Members may be the subject of Foreign Interference or Foreign Influence risks and must disclose any Foreign Interactions, Foreign Ownership Control and Influence (FOCI), Sensitive Research, Conflict of Interest, Outside Employment (including Outside Directorship), or receipt of a Gift or Benefit from a Foreign Entity, through the University's Conflict of Interest form as soon as the risk is identified, and at least annually. Such disclosures will be reviewed by the University Member's supervisor and will be managed in accordance with the relevant University procedure.

Strategies for managing other forms of Foreign Interactions such as international travel, recruitment, Procurement, Research Activities, and collaborations should also be considered and will be managed in line with the relevant University policies and procedures including the Conflicts of Interest Procedure.

Supervisors will review each Declaration and, where appropriate, work with the Employee to develop a Management Strategy to address the risk. Declarations will be recorded in the Conflicts of Interests Register, together with any Management Strategies, and will be maintained by the Director (Integrity and Professional Conduct), in conjunction with the People Portfolio.

4.1.1 Foreign Interference

Foreign Interference is a potential risk arising from all Foreign Interactions, therefore adequate consideration must be given to the people and entities involved, the associated activity, and the nature of the interaction.

The Foreign Interactions Due Diligence Form is used to identify and assess associated risks and where required, escalated to the relevant University officers for further action.

If a Foreign Interference risk is identified within University operations, the University Member's supervisor, Student's Head of School/College, or Higher Degree by Research (HDR) Student's Centre Director must be notified, who will assess the risk and consider what mitigation measures are required, including but not limited to:

1. requesting additional due diligence of the partner, activity, or collaboration.
2. determining any specific contractual protections.
3. reconsideration of the engagement.

If at any point during the process, a significant risk is identified, the supervisor or Head of School/College will notify the Chief Operating Officer and Chief Financial Officer for further advice.

The UFIT Lowest Effective Dose Due Diligence Framework identifies three categories of risk within Research collaborations. These are:

- *Who* - the Australian partner, their proposed partner or collaborator, and the partnering institution;
- *What* - the subject of the Research; and
- *How* - the nature of the collaboration.

University Members will use the Foreign Interactions in Research Due Diligence Checklist to undertake an initial risk assessment of proposed activities with foreign partners, looking for indicators of risk in all three categories.

4.1.2 Foreign Influence

The Australian Government Foreign Influence Transparency Scheme (FITS) was established to provide the Australian public and Australian government decision-makers with visibility of the nature, level and extent of Foreign Influence on Australia's government and political process.

Under the FITS, individuals, and entities such as the University, have an obligation to register activity that is undertaken on behalf of a Foreign Principal, for the primary purpose of influencing political or Commonwealth Government outcomes.

University Members, and Students are required to disclose any registerable activities or arrangements under the *Foreign Influence Transparency Scheme Act 2018* to the relevant Contract Officer or Research Contract Officer for assessment and registration on the Transparency Portal. Resultant data will be made publicly available on the Attorney-General's Department Transparency Scheme Public Register.

Failure to comply with the *Foreign Influence Transparency Scheme Act 2018* may result in a criminal offence.

4.2 Foreign Arrangements Scheme (FAS)

The Foreign Arrangements Scheme (FAS) was established by the *Australia's Foreign Relations (State and Territory Arrangements) Act 2020* to ensure that arrangements between state and territory governments (and their entities, including public universities) and Foreign Entities do not adversely affect Australia's foreign relations and are not inconsistent with Australia's foreign policy.

The University is required to notify the Minister of Foreign Affairs of Foreign Arrangements that fall within the scheme, in respect of both prospective arrangements and pre-existing arrangements, as well as subsidiary arrangements entered for the purposes of implementing a Foreign Arrangement.

University Members or Students proposing to enter, or who have entered an informal (pre-contractual) arrangement that involves a Foreign Entity, are required to complete the Foreign Arrangement Scheme (FAS) Notification Form and submit it to the relevant Contract Officer or Research Contract Officer for assessment.

The Contract Officer or Research Contract Officer will assess whether the proposal is subject to the requirements of *Australia's Foreign Relations (State and Territory Arrangements) Act 2020* and will contact the University's International Office to determine if a notification is required. If notification is required, the University's International Office will upload the FAS Notification form and details of the Foreign Arrangement to the Department of Foreign Affairs and Trade (DFAT) portal. DFAT will assess the notification and publish the arrangement on the Public Register. The Public Register will include information about the Foreign Arrangement, including whether a decision has been made by the Minister of Foreign Affairs in relation to the arrangement. Certain sensitive materials may not need to be included on the Public Register.

4.3 Defence Industry Security Program (DISP)

The Defence Industry Security Program (DISP) assists in securing defence capability through strengthened security practices in partnership with industry and enhances Defence's ability to manage risk in the evolving security environment. The Australian Government Security Vetting Agency (AGSVA) manage the DISP to support Defence Groups and Services, and defence industry in managing security risks.

As part of the University's DISP membership, the University must nominate a Chief Security Officer (CSO). The University has nominated the Executive Director (Institute for Advanced Engineering and Space Sciences) as the CSO, responsible for oversight of security arrangements and championing a security culture at the University for the purposes of the DISP.

The University must nominate a Security Officer (SO) who is responsible for the development and implementation of the DISP security procedures and plans, and acts on behalf of the CSO. The University has nominated the Research Infrastructure Coordinator (Security Officer) as the SO.

The University has been granted a DISP Membership at the following levels.

- Governance Security: Entry Level
- Physical Security: Entry Level
- Information & Cyber Security: Entry Level
- Personnel Security: Entry Level

The University must continue to meet the ongoing eligibility and suitability requirements, as outlined in the *Defence Security Principles Framework (DSPF) Principle 16 and Control 16.1 Defence Industry Security Program* to maintain its membership.

4.4 Reporting

National Security concerns or complaints pertaining to University business will be reported in accordance with the following University policies and procedures.

- Code of Conduct Policy - applicable to University Employees, members of the University Council and University Committees, visiting and adjunct academics and volunteers who contribute to University activities or who act on behalf of the University;
- Student Grievance Resolution policy and procedure - applicable to University Students and Higher Degree by Research (HDR) Students; and

- Complaints Management Procedure - applicable to all other sources.

Any reported concerns or complaints will be escalated to the Vice-Chancellor for review and if required, further action. This may include seeking advice through external agencies such as the National Counter Foreign Interference Coordination Centre, or Department of Defence.

5 References

Australian Cyber Security Centre

Australian Security Intelligence Organisation (ASIO)

Counter Foreign Interference Coordination Centre

6 Schedules

This procedure must be read in conjunction with its subordinate schedules as provided in the table below.

7 Procedure Information

Accountable Officer	Vice-Chancellor
Responsible Officer	Chief Operating Officer and Chief Financial Officer
Policy Type	University Procedure
Policy Suite	National Security Policy
Subordinate Schedules	
Approved Date	24/4/2025
Effective Date	24/4/2025
Review Date	24/4/2030
Relevant Legislation	Australia's Foreign Relations (State and Territory Arrangements) Act 2020 Autonomous Sanctions Act 2011 Autonomous Sanctions Regulations 2011 Charter of the United Nations Act 1945 (Cth)

	<i>Charter of the United Nations (Dealing with Assets) Regulations 2008</i> <i>Defence and Strategic Goods List 2021</i> <i>Defence Trade Controls Act 2012</i> <i>Foreign Influence Transparency Scheme Act 2018</i> <i>National Security Legislation Amendment (Espionage and Foreign Interference) Act 2018</i> <i>Weapons of Mass Destruction (Prevention of Proliferation) Act 1995</i>
Policy Exceptions	Policy Exceptions Register
Related Policies	Code of Conduct Policy Conflict of Interest Policy Corrupt Conduct Reporting Policy Enterprise Risk Management Policy Public Interest Disclosure Policy Recruitment, Selection and Appointment Policy Research Code of Conduct Policy Student Grievance Resolution Policy
Related Procedures	Complaints Management Procedure Conflict of Interest Procedure Corrupt Conduct Resolution Procedure Enterprise Risk Management Procedure Gifts and Benefits Procedure Outside Work Procedure Sanctions and Export Controls Procedure Student Grievance Resolution Procedure
Related forms, publications and	Attorney-General's Department - Foreign Influence Transparency Scheme Public Register

websites	Australian Security Intelligence Organisation- Counter Espionage and Foreign Interference Australian Security Intelligence Organisation- Think Before You Link Conflict of Interest form Countering Foreign Interference (UniSQ SharePoint page) Defence Security Principles Framework (DSPF) Principle 16 and Control 16.1 Defence Industry Security Program Defence and Strategic Goods List Department of Home Affairs - Countering Foreign Interference Foreign Arrangements Scheme Foreign Arrangement Scheme (FAS) Notification Form Foreign Influence Transparency Scheme (FITS) University Foreign Interference Taskforce (UFIT) Guidelines to Counter Foreign Interference in the Australian University Sector UniSQ Foreign Interactions in Research Due Diligence Checklist - First Pass UniSQ Foreign Interactions Due Diligence Form - Second Pass UniSQ Foreign Arrangement Scheme UniSQ Gifts and Benefits Declaration and Application for a Gift to be Given
Definitions	<p>Terms defined in the Definitions Dictionary</p> <p>Academic Freedom</p> <p>Academic Freedom comprises: the freedom of Employees, in the course of their academic activities, to educate, discuss, or research and to disseminate and publish the results of those activities; the freedom of Employees and Students, in the course of their academic activities, to engage in intellectual inquiry, to express their opinions and beliefs, and to contribute to public debate, in relation to those activities; the freedom of Employees and Students to express their opinions in relation to the University; the freedom of Employees, without constraint imposed by reason of their employment by the University, to make lawful public comment on any issue in their</p>

personal capacities; the freedom of Employees to participate in or speak on behalf of professional or representative bodies and associations; the freedom of Students to participate in or speak on behalf of student societies and associations; and the autonomy of the University in relation to the choice of Academic Programs and Courses, the ways in which they are taught and the choices of research activities and the ways in which they are conducted. Public comment is not made in a personal capacity where: the comment includes a reference, express or implied, to the University; or the Employee identifies their employment or any affiliation with the University, refers to their position in the University.

[Autonomous Sanctions](#)

Sanctions as defined in the 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.

[Baseline Security Clearance Level](#)

A Baseline Security Clearance is the lowest of the four security clearance levels granted by the Department of Defence. The Baseline Security Clearance permits access to classified resources up to and including 'PROTECTED'.

[Chief Security Officer \(CSO\)](#)

The Chief Security Officer must be a member of the entity's board of directors (or similar governing body), executive personnel, general partner, or senior management official with the ability to implement policy and direct resources. They must be able to obtain and maintain a Baseline security clearance.

[Conflict of Interest](#)

If a University Member has an interest that conflicts or may conflict with the discharge of the University Member's duties the University Member should Declare the nature of the interest and the conflict to the University Member's Supervisor as soon as practicable after the relevant facts come to the University Member's knowledge and must not take action or further action relating to a matter that is or may be affected by the conflict until authorised. An Executive Leader may direct a University Member to resolve a conflict or possible conflict between an interest of the University Member and the University Member's duties. A reference to an interest or to a Conflict of Interest is a reference to those matters within their ordinary meaning under the

general law, and, in relation to an interest, the definition in the Acts Interpretation Act 1954, Schedule 1, does not apply. A Conflict of Interest will arise when a University Member's Private Interests conflict with their duty to the University or to serve the public interest as a University Member. The risk of having a conflict of interest increases where a University Member's responsibilities include the authority to make decisions. A conflict of interest may be potential, perceived or actual - when a University Member is in a role where future decision making may be influenced by their Private Interests if a certain condition is fulfilled, they have a potential conflict of interest; a perceived conflict of interest arises where it appears that decisions a University Member make in the course of their University employment may be influenced by their Private Interests, whether or not this is in fact the case; an actual conflict of interest exists where a University Member's actions could be unduly, improperly or excessively influenced by their Private Interests. Serious misconduct can occur when a conflict of interest is concealed, understated, mismanaged or abused.

[Core Foreign Arrangement](#)

An arrangement between a State or Territory, their government, departments or agencies and a core Foreign Entity.

[Core Foreign Entities](#)

Include a foreign country, it's national government and a department or agency of the national government.

[Defence Industry Security Program \(DISP\)](#)

The Defence Industry Security Program (DISP), managed by the Defence Industry Security Office (DISO), supports Australian businesses to understand and meet their security obligations when engaging in Defence projects, contracts and tenders. It is essentially security vetting for Australian businesses.

[Employee](#)

A person employed by the University and whose conditions of employment are covered by the Enterprise Agreement and includes persons employed on a continuing, fixed term or casual basis. Employees also include senior Employees whose conditions of employment are covered by a written agreement or contract with the University.

[Export Controls](#)

Export Controls refers to the control of the supply, export, publication or brokering of military and dual-use goods and technology. Australia's Export Controls include the physical export of controlled goods and technology from Australia; the intangible transfer (e.g., emails) of controlled technology from Australia to overseas; the publishing of controlled military technology; and the brokering of controlled military goods and technology. It also includes 'catch all' (or 'end-use') controls.

[Foreign Arrangement](#)

Foreign arrangements are written arrangements, agreements, contracts, understanding or undertakings between the Australian State and Territory entities and foreign entities. They may be legally binding or not legally binding. A Foreign Arrangement is an arrangement between: a) a State/Territory entity; and b) a Foreign Entity; whether or not other entities are also a party to the arrangement.

[Foreign Entity](#)

Foreign Entity includes a foreign country, its national government and a department or agency of that national government, as well as sub-national level governments in foreign countries, departments of those sub-national level governments, public entities established under the authority of a foreign country or its national or sub-national government, universities without institutional autonomy and any other entities prescribed by the rules.

[Foreign Government](#)

A Foreign Government includes a foreign national or sub-national government (including a department, agency or other public authority of that government).

[Foreign Influence](#)

All governments, including Australia's, try to influence deliberations on issues of importance to them. These activities, when conducted in an open and transparent manner, are a normal aspect of international relations and diplomacy and can contribute positively to public debate.

[Foreign Influence Transparency Scheme \(FITS\)](#)

The Foreign Influence Transparency Scheme commenced on 10 December 2018. The purpose of the scheme is to provide the public with visibility of the nature, level and extent of Foreign Influence on

Australia's government and politics.

[Foreign Interaction](#)

Foreign Interaction refers to any interaction between an Australian State and Territory entity and a foreign entity, which may or may not lead to a Foreign Arrangement.

[Foreign Interference](#)

Foreign Interference occurs when activities are carried out by, or on behalf of a Foreign Actor, which are coercive, clandestine, deceptive or corrupting and are contrary to Australia's sovereignty, values and national interests.

[Foreign Ownership Control and Influence \(FOCI\)](#)

An entity is considered to be operating under FOCI when a foreign interest has the power, direct or indirect whether or not exercised, and whether or not exercisable, through the ownership of the company under the purview of its National Security Authority/Designated Security Authority, by contractual arrangements or other means, to direct or decide matters affecting the management or operations of that entity in a manner which may result in unauthorised access to classified information or adversely affect the performance of classified contracts or may otherwise be contrary to the interests of national security.

[Foreign Principal](#)

Foreign Principal includes: (a) a foreign government; (b) a foreign government related entity; (c) a foreign political organisation; (d) a foreign government related individual.

[Head of School/College](#)

An academic staff member responsible for the administration of the Course offerings in one or more discipline areas.

[Higher Degree by Research \(HDR\) Student](#)

A Student enrolled in an HDR program.

[Institutional Autonomy](#)

As interpreted in the Australia's Foreign Relations (State and Territory Arrangements) Act 2020 .

[Non-Core Foreign Arrangements](#)

An arrangement between a State or Territory, their government, departments or agencies and a non-core Foreign Entity.

[Non-Core Foreign Entities](#)

Include sub-national level governments in foreign countries, departments of those sub-national level governments, public entities established under the authority of a foreign country or it's national or sub-national government, universities without institutional autonomy and any other entities prescribed by the rules.

[Procurement](#)

The entire process by which all classes of materials, facilities and services are obtained by the University. This can include the functions of planning, design, establishing standards, evaluating risk, writing specifications, selecting Suppliers, developing contracts and method of payment and subsequent disposal.

[Research](#)

Research is the creation of new knowledge and/or the use of existing knowledge in a new and creative way to generate new concepts, methodologies, inventions and understandings. This could include the synthesis and analysis of previous research to the extent that it is new and creative.

[Research Activities](#)

Refers to activities that result in the creation of new knowledge and/or the use of existing knowledge in a new and creative way so as to generate new concepts, methodologies and understandings. This could include synthesis and analysis of previous research to the extent that it leads to new and creative outcomes.

[Security Officer \(SO\)](#)

A Security Officer must be able to obtain and maintain a Baseline security clearance (for Entry Level membership) or the minimum of a NV1 security clearance (for membership Levels 1, 2 and 3). This position may have the ability to nominate and sponsor clearances within the business.

[Sensitive Research](#)

Sensitive Research involves goods, software or technology that is

regulated when exported, supplied, brokered, or published as indicated by the Defence and Strategic Goods List (DSGL) and identified by the Australian Government Department of Defence. The Online DSGL Tool can be used to conduct text-based searches to identify any specific control items.

Student

A person who is enrolled in a UniSQ Upskill Course or who is admitted to an Award Program or Non-Award Program offered by the University and is: currently enrolled in one or more Courses or study units; or not currently enrolled but is on an approved Leave of Absence or whose admission has not been cancelled.

University

The term 'University' or 'UniSQ' means the University of Southern Queensland.

University Members

Persons who include: Employees of the University whose conditions of employment are covered by the UniSQ Enterprise Agreement whether full time or fractional, continuing, fixed-term or casual, including senior Employees whose conditions of employment are covered by a written agreement or contract with the University; members of the University Council and University Committees; visiting, honorary and adjunct appointees; volunteers who contribute to University activities or who act on behalf of the University; and individuals who are granted access to University facilities or who are engaged in providing services to the University, such as contractors or consultants, where applicable.

Definitions that relate to this procedure only

Declare or Declaration

A written statement by a University Member of the relevant personal interests, and possibly those interests of individuals closely related to the person, where these interests may cause a Conflict of Interest. A Declaration involves registering details of the Conflict of Interest, reporting the Conflict of Interest to their supervisor, and developing an agreed approach to manage the conflict.

Public Register

The Minister must keep a Public Register and make that register available for public inspection on the internet. Broadly, the Public Register must contain particular information about foreign

	<p>arrangements to which this Act applies, and their subsidiary arrangements. Some information must not be included on the Public Register (such as commercially sensitive information).</p> <p>Division 1 and 4 of Australia's Foreign Relations (State and Territory Arrangements) Act 2020</p> <p>Registrable Activities</p> <p>An activity funded or conducted on behalf of or under the direction of a Foreign Principal. A registerable activity is political in nature and may include:</p> <ul style="list-style-type: none"> • parliamentary lobbying • general political lobbying • communications activities • disbursement activity (payment of money or things of value). <p>Foreign Influence Transparency Scheme - Fact sheet 5</p> <p>Registerable Arrangement</p> <p>A registrable arrangement is an arrangement between a person and a Foreign Principal for the person to undertake, on behalf of the Foreign Principal, one or more activities that, if undertaken by the person on behalf of the Foreign Principal, would be registrable in relation to the Foreign Principal.</p> <p>Section 13A, Foreign Influence Transparency Scheme Act 2018</p>
Keywords	Foreign, International, Overseas, Collaboration, Partnership, Research, Arrangement, Interference, Influence, Defence, Australia, Country, Sovereign, Risk, Threat, Counter, Terrorism, Conflict, Interest, Col, Outside, Employment, Ownership, Control, FOCI, Autonomous
Record No	21/554PL