



Australian Government  
Australian Research Council

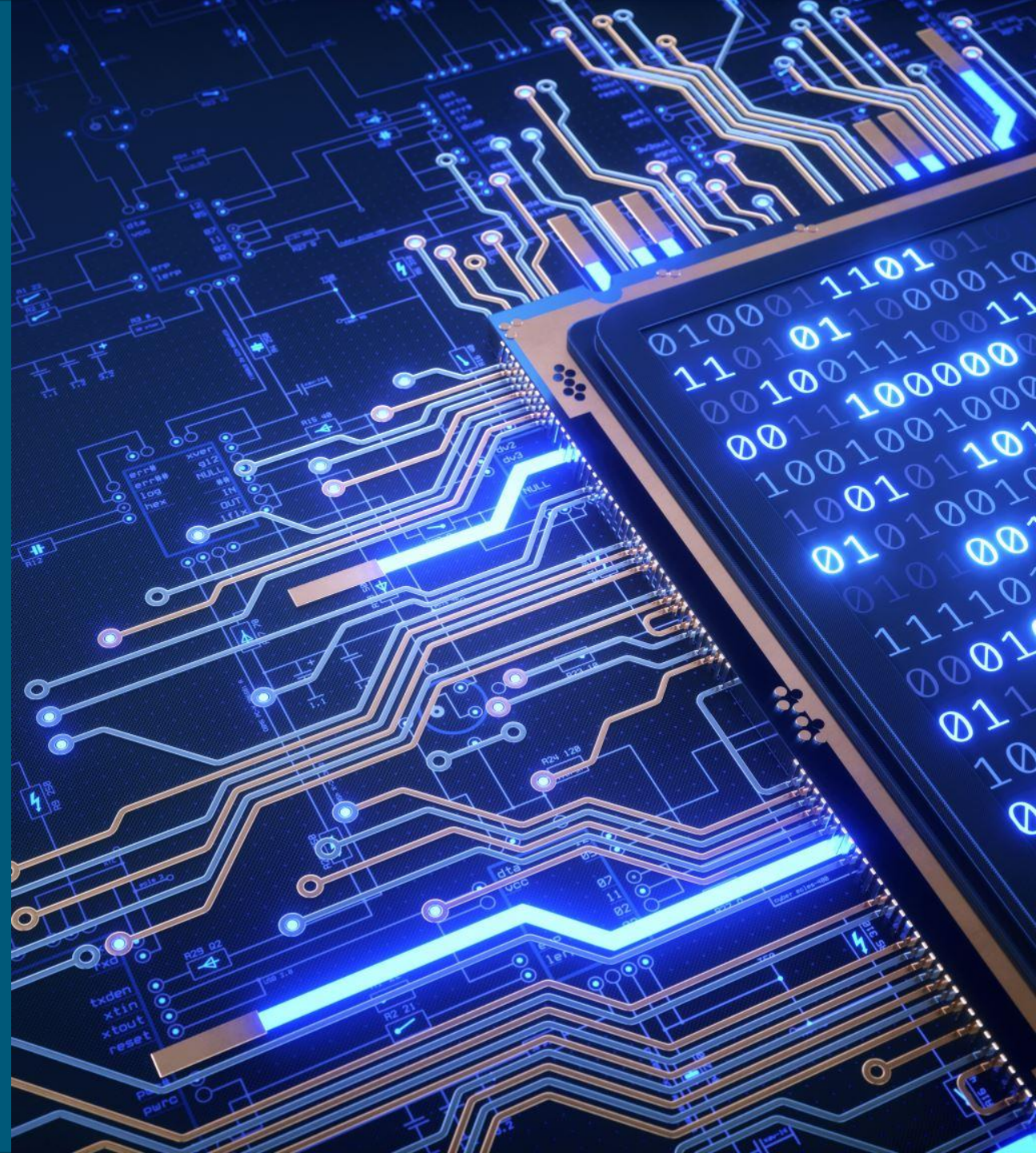
ARC

# ARC Countering Foreign Interference Framework

A guide to roles, responsibilities and processes in  
relation to protecting ARC-funded research

December 2023

(to be revised following enactment of the amended ARC Act – expected mid-2024)



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# Purpose of the ARC Countering Foreign Interference (CFI) Framework



Australian world-class research is an important contribution to developing technologies that underpin our future. As a result, Australian research can be an attractive target for foreign interference.



As the main funding agency for non-clinical research in Australia, the ARC has a responsibility to have processes in place that help protect the research it funds from misuse.



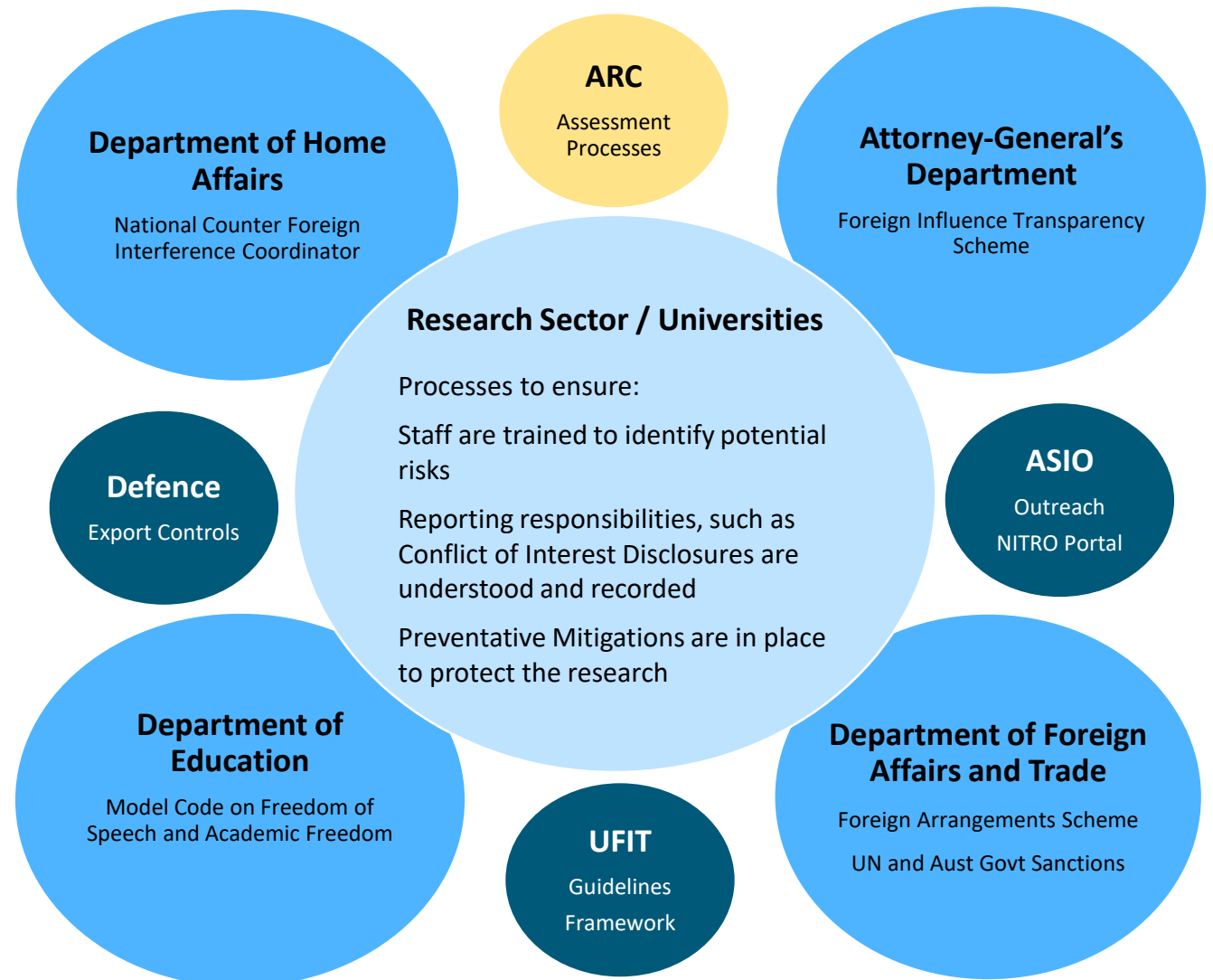
The purpose of the ARC Countering Foreign Interference (CFI) Framework is to articulate these processes, including the roles and responsibilities of the ARC, universities, researchers, and other government agencies in relation to ARC grants and grant processes.



# The ARC - part of Australia's multifaceted approach



The ARC CFI Framework complements and works with other frameworks, guidelines, tools and practices within universities and government that assist with the identification and management of potential foreign interference risks.



# CFI Assessments at Relevant Stages of the ARC grants lifecycle



The ARC undertakes CFI risk assessments at various stages of the National Competitive Grants Program (NCGP) Grant lifecycle. A risk-based approach is applied to each stage of CFI assessment to ensure appropriate mitigations are in place to protect the research.

Proposals

Peer review /  
Assessments

Selection  
Meetings

Approval of  
Funding

# Pre-award Applications – CFI considerations

## University reviews applications

Ensure staff are aware of all their disclosure requirements and trained to identify and report potential risks.

University undertakes CFI checks on all participants listed on application.

Due diligence risk assessments undertaken as outlined in the UFIT Guidelines and UFIT Due Diligence Framework.

Ensures that information provided to the ARC is accurate and all Conflicts of Interest and relationships have been declared in RMS.

Any potential risks are identified, and the university ensures there are appropriate mitigations in place.

University submits application to the ARC.

## ARC reviews applications

Using information within the application and open-source data the ARC will identify potential risks.

Where an application relates to Critical Technology, the ARC will consider other potential risks, including:

1. Current or recent foreign financial support, education or research related activities.
2. Current or recent involvement in a foreign talent program or obligations to a foreign university.
3. Current or recent associations with a foreign government, military, policing or intelligence organisation.
4. Recent association with a regime, person or organisation with which Australia has sanctions in place.

Advice will be sought from National Security Agencies where required.

Additional assurances will be sought from universities where required.

## National Security Agencies review identified risks

Reviews using additional resources and informs ARC of any high-risk issues.

## Additional assurances required

University provides assurances to the ARC that suitable mitigations and protections are in place for risks identified at project and institutional level.

## ARC reviews additional information

ARC reviews additional information provided and informs the Minister for their consideration.

## Minister makes final decision

Is informed if any potential risks have been identified and if the appropriate mitigations are in place. Makes final determination and funding decisions.

→ **Issue identified**

→ **No issue identified**

# Assessors / Committee membership – CFI considerations



Assessors and committee members are required to declare interests in the ARC's Research Management System (RMS). RMS profiles must be up to date regarding any foreign funding, talent programs, foreign associations/affiliations, recent education and employment history.

All assessors that are part of the ARC peer review process are reminded of their obligations to declare their interests, including all those outlined in the ARC Conflict of Interest and Confidentiality Policy each time they are assigned to assess a scheme round in RMS.



Current or recent foreign financial support, education or research related activities.



Current or recent involvement in a foreign talent program or obligations to a foreign university.



Current or recent association with a foreign government, military, policing or intelligence organisation.



Recent association with a regime, person or organisation with which Australia has sanctions in place.



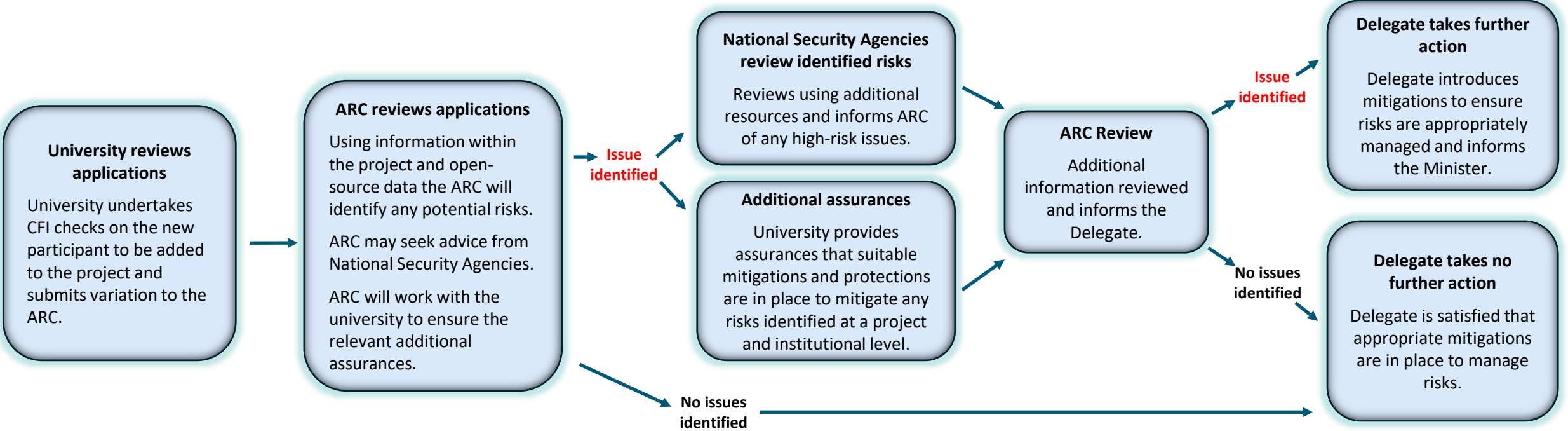
The ARC will also undertake a CFI assessment on all committee members prior to them being appointed. If a potential risk is identified, the employing institution and national security agencies may be contacted for additional assurances.

# Post-award Variations – CFI considerations



When a new researcher/organisation is being added to an ARC funded project, or an existing named researcher changes affiliation, the ARC will assess the information regarding the researcher using information from their RMS profile and open-source information.

If the ARC identifies a potential risk, national security agencies may be invited to review and advise. The relevant Administering Organisation (lead university) will be asked to outline the controls they have in place at both the institutional and the project level to mitigate identified risks. If the university fails to provide information demonstrating that potential risks are mitigated, the ARC may not approve the addition of the new researcher/organisation to the project.





# Resources

## ARC

[Countering Foreign Interference](#)

[ARC Conflict of Interest and Confidentiality Policy](#)

[ARC Research Integrity Policy](#)

## UFIT

[University Foreign Interference Taskforce \(UFIT\)](#)

[Guidelines to Counter Foreign Interference in the Australian University Sector](#)

## Department of Education

[Model Code on Freedom of Speech and Academic Freedom](#)

## Home Affairs

[National Counter Foreign Interference Coordinator](#)

[Countering Foreign Interference](#)

## Department of Industry, Science and Resources

[Critical Technologies Statement](#)

## Attorney-General's Department

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

## Department of Defence

[Defence Export Controls \(DEC\)](#)

## Australian Security Intelligence Organisation (ASIO)

[ASIO Outreach team](#)

## Department of Foreign Affairs and Trade

[Sanctions Regimes](#)

[Consolidated List](#)

[Foreign Arrangements Scheme](#)

## Australian Strategic Policy Institute

[Chinese Defence Universities Tracker](#)