



Australian Government
Australian Research Council

ARC Research Security Framework

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The Australian Research Council

The ARC is a non-corporate Commonwealth entity established under the *Australian Research Council Act 2001* (ARC Act). It is located within the Australian Government's Education portfolio and reports to the Minister for Education. The ARC is a vital component of Australia's innovation and research system. It plays an integral role in supporting the research sector to produce excellent and impactful research for Australia's economic, social, environmental and cultural benefit through the delivery of the National Competitive Grants Program (NCGP). The NCGP funds excellent pure basic, strategic basic and applied research in all disciplines except medical research.

The ARC's broader remit includes the provision of high-quality research policy advice to the Australian Government and supporting research security and integrity. It also includes promoting ethical research, evaluating the excellence, impact and depth of Australian research and expanding Aboriginal and Torres Strait Islander knowledge systems. It also facilitates partnerships between researchers and industry, government, community organisations and the international community.

Purpose of the ARC Research Security Framework

The *ARC Research Security Framework* (Framework) provides transparency in relation to the ARC's approach to managing risks relating to security, defence and international relations. These activities are undertaken to protect ARC funded research from risk and support the Minister to fulfil their obligations under the ARC Act. The Framework is a publicly facing document that provides an overview of activities undertaken by the ARC to remain responsive to research security risks at all stages of a grant.

The ARC is committed to protecting the research it funds from misuse, while maintaining support for the international collaboration that underpins much intellectual and scientific progress. This Framework outlines how the ARC supports compliance with its legislation by working in partnership with Australian universities and government agencies.

Australia's research security system

Australia's research sector is globally recognised for its research excellence. Our research makes a significant contribution to national prosperity and innovation. This does, however, mean that research undertaken at Australian universities can be affected by risks relating to security, defence and international relations. Security agencies advise that strategic rivals are increasingly targeting Australia's advanced science and technology with commercial and military applications – including from the Australian research sector.

The ARC's approach to managing risk is part of a system-wide partnership across Australian Government agencies to promote research security within Australian universities. Universities are responsible for safeguarding the research they conduct and must conform to a range of regulatory and legislative requirements designed to protect Australia's research and national interests. This system of controls provides a broader framework of risk mitigations that support ARC applications, funded projects and peer review activities. Relevant legislation and programs include:

- University Foreign Interference Taskforce [Guidelines to Counter Foreign Interference in the Australian University Sector](#) (Department of Home Affairs)
- [Security of Critical Infrastructure Act 2018](#) (Department of Home Affairs)
- [Protecting Australia's Critical Technology regulations](#) (Department of Home Affairs)
- [Critical Technology Framework](#) (Department of Industry, Science and Resources)
- [Defence Trade Controls Act 2012](#) (Department of Defence)
- [Defence Act 1903](#), including the Safeguarding Australia's Military Secrets (SAMS) amendments
- [Defence Industry Security Program](#) (Department of Defence)
- [Defence Research, Innovation and Collaboration Security Program](#) (Department of Defence)
- [Australia's Foreign Relations \(State and Territory Arrangements\) Act 2020](#) (Department of Foreign Affairs and Trade)
- [Autonomous Sanctions Act 2011](#) (Department of Foreign Affairs and Trade)
- [Foreign Influence Transparency Scheme](#) (Attorney-General's Department).

Frameworks also exist internationally that inform university research security responsibilities, such as through the identification of proscribed individuals and entities under the *Charter of the United Nations Act 1945*.

ARC legislative responsibilities

The ARC Act assigns the Minister for Education powers relating to the consideration of the security, defence and international relations of Australia within the context of ARC research grant programs. In relation to NCGP funding schemes, and considering risks relating to Australia's security, defence and international relations, the Minister has powers to:

- refuse to approve grants of financial assistance (for designated research programs, such as the ARC Centres of Excellence or Industrial Transformation Research Program) (Section 48[6])
- issue a notice to the ARC Board, requiring that the ARC Board not approve a grant of financial assistance (in relation to all other research programs) (Section 47[8])
- terminate a grant of financial assistance that has previously been approved by the Minister or the ARC Board (Section 52[1]).

The Minister must have regard to the reasons outlined in Section 55 of the ARC Act, in deciding whether there are reasons relevant to the security, defence or international relations of Australia. Section 55 includes scope for the Minister to consider relevant individual circumstances pertinent to particular applications or funded projects.

55 Reasons relevant to the security, defence or international relations of Australia

(1) The Minister must, in deciding whether there are reasons relevant to the security, defence or international relations of Australia for the making of a decision under subsection 47(8), 48(6) or 52(1), have regard to the following:

- (a) the nature and extent of the organisation's research activities (if any) that are being, or have been, carried out and the financial support (if any) the organisation has received for those activities from a foreign government body;
- (b) whether the organisation or a person involved in the research project concerned has, or has had, an association with a tertiary education institution (however described) located outside Australia and, if so, the nature of that association;
- (c) whether the organisation or a person involved in the research project concerned has, or has had, an association with a foreign government body, foreign law enforcement agency, foreign military body or foreign intelligence agency and, if so, the nature of that association;
- (d) whether the organisation or a person involved in the research project concerned has, or has had, an association with a foreign country upon which the Security Council of the United Nations or Australia has imposed a sanction and, if so, the nature of that association;
- (e) whether the organisation or a person involved in the research project concerned has, or has had, an association with a person or entity proscribed by an instrument under the *Autonomous Sanctions Act 2011* and, if so, the nature of that association;
- (f) whether the organisation or a person involved in the research project concerned has, or has had, an association with a proscribed person or entity within the meaning of Part 4 of the *Charter of the United Nations Act 1945* and, if so, the nature of that association.

(2) The Minister may have regard to any other matters that the Minister considers appropriate.

The ARC Act includes reporting requirements for the Minister to inform the ARC Board, the Australian Parliament and the Parliamentary Joint Committee on Intelligence and Security where powers under Sections 47(8), 48(6) or 52(1) are used.

ARC research security principles

The ARC research security principles provide a strategic framework for ARC risk assessment processes in relation to security, defence and international relations. The principles afford transparency to the Australian university sector regarding research security objectives and expectations. They also provide a framework for the provision of advice to the Minister. The principles are designed to support an Australian research landscape that is as open as possible, and as secure as necessary.

PRINCIPLE 1: ADVANCE AUSTRALIA'S NATIONAL INTEREST

- International research collaborations make significant contributions to the quality and impact of Australia's research sector by supporting access to world-leading expertise, shared resources and increased visibility. International collaboration will be supported where the associated risks are appropriately managed.
- ARC-funded research is expected to have a clear short or longer-term benefits to Australia and be consistent with Australian Government policy objectives, including those relating to security, defence and international relations.
- ARC funded research needs to be appropriately protected to ensure the Australian Government's investment in research and development aligns with Australia's national interest. This includes the management of intellectual property arising from ARC grant opportunities. Protections are particularly important within the context of research relating to critical technologies or with dual-use potential.
- Where risks to Australia's security, defence or international relations cannot be effectively mitigated, or where residual uncertainty remains material, the benefit of the doubt will be afforded to the national interest.

PRINCIPLE 2: RESEARCH SECURITY IS A SHARED RESPONSIBILITY

- Research security is a collective responsibility shared between individual researchers, universities and cross-government stakeholders.
- ARC research security activities complement risk mitigation efforts undertaken across the Australian Government and by Australian universities. The ARC's risk assessment processes are based on an understanding that other parts of the national research security ecosystem are operating effectively.

- University compliance with Australian Government policies, frameworks and programs designed to manage research security risks is assumed. Relevant frameworks include, but are not limited to, the University Foreign Interference Taskforce Guidelines, the Foreign Arrangements Scheme and the *Defence Trade Controls Act 2012*. ARC risk assessments are informed by advice from relevant parts of government, where required.
- Secure and open research depends on rigorous transparency from researchers, assessors and universities. Full and forthright declarations of foreign affiliations, associations and funding is foundational to the maintenance of trust in ARC processes and across Australia’s research and innovation ecosystem.

PRINCIPLE 3: PROPORTIONATE, RISK-BASED DECISION-MAKING

- Research security risks cannot be eliminated but must be managed in a manner proportionate to the potential threat. ARC risk assessments will involve a balanced consideration of ARC objectives to promote innovation and productivity against potential threats, with higher risk cases receiving greater scrutiny.
- ARC research funding is awarded to Australian universities for the purpose of early-stage research with research outcomes generally intended for open access publication.¹ The nature, value, duration and scale of the project inform proportionate assessments of risk.
- ARC research security assessments are informed by available information and advice. Relevant government agencies may assist in providing case-specific or general advice related to their portfolio expertise to support decision-making.
- ARC risk assessment frameworks will be regularly reviewed to reflect emergent geopolitical threats, the evolving research and development landscape and changes to Australian Government advice.

PRINCIPLE 4: NATIONAL AND GLOBAL RESPONSIBILITY

- ARC funded research is expected to be consistent with Australia’s status as a responsible global actor, including adherence to the highest ethical, legal and social standards.
- Aligning the Australian Government’s investment in university research to the core values of a transparent and ethical global research ecosystem builds trust both domestically and internationally. Funded projects need to be safeguarded against misuse.
- Australia will continue to demonstrate international leadership by embedding global responsibility into ARC decision-making.

¹ As per the *ARC Open Access Policy*.

Conceptualising research security risks

The ARC's approach to research security incorporates the three areas of responsibility identified in the ARC Act – security, defence and international relations. The table below defines these areas of responsibility and a number of the relevant outcomes and risk indicators that inform ARC risk assessments. The ARC's approach recognises that risks relating to Australia's security, defence and international relations are overlapping and interdependent in nature.

Security

The protection of the nation's territory, institutions, and the safety of all Australians. This includes safeguarding against threats such as terrorism, foreign interference, espionage, cyberattacks, and harm to critical infrastructure.

Objectives:

- Transfers of intellectual property are appropriately regulated
- Covert influence of international actors on ARC research is minimised
- Academic freedom of enquiry and Australia's inclusive national identity built around our shared values are supported
- University critical infrastructure, resources and data are used appropriately.

Risk indicators may include, but are not limited to:

- The extent, nature and currency of affiliations with foreign institutions (e.g. appointments, talent plan participation, funding sources)
- The extent, nature and currency of collaboration networks (co-authors, recruitment, supervision)
- Relevance to critical technology, technological readiness level and the potential for unwanted transfers of research outcomes
- The accuracy, currency and completeness of information provided to the ARC in terms of international affiliations, associations and funding.

Defence

Strategic, military, industrial, and policy measures required to ensure Australia can resist coercion, contribute to regional stability, and, if necessary, conduct armed conflict in support of national objectives.

Objectives:

- Intellectual property from defence-related research is used in a manner consistent with Australia's national interests
- Research outcomes are consistent with Australian international partnerships and strategic defence objectives

- Research with potential for dual-use is identified and managed appropriately.

Risk indicators may include, but are not limited to:

- Extent, nature and currency of affiliations with defence, military and/or intelligence linked institutions
- Research and funding history, such as previous projects involving funding from defence, security or military institutions
- Research that relates to defence-related outcomes or has dual-use potential.

International Relations

Advancing Australia's interests globally through diplomacy, trade, development, security cooperation, and coordinated engagement with international partners.

Objectives:

- ARC funding arrangements support individuals, organisations and nations in a manner consistent with Australia's status as a responsible global actor
- ARC funded research and research partnerships are consistent with sanctions law and international agreements
- ARC funded research and research partnerships strengthen and protect Australia's bilateral relationships.

Risk indicators may include, but are not limited to:

- Extent, nature and currency of affiliations or collaboration networks with proximity to actors involved in human rights violations
- Extent, nature and currency of affiliations or collaboration networks with proximity to sanctioned activities, nations, organisations or individuals
- Extent, nature and currency of affiliations or collaboration networks with proximity to actors involved in foreign interference activities
- Potential for project participants and/or the research project to contribute to bilateral sensitivities.

The ARC understands research security risk as a combination of the likelihood that a threat could impact Australia's national interests (economic, social, environmental and cultural prosperity; security, defence and international relations), and the severity of the consequence should that threat be realised.

In operationalising the legislative parameters established by Section 55 of the ARC Act, the ARC may draw upon a range of information, including declarations made by research stakeholders, open-source resources, information provided by universities, and policy positions and advice from other Australian Government agencies. Particular consideration is afforded to research that presents higher risks of unregulated intellectual property transfer; has defence or dual-use applications; and/or relates to

critical technology. This aligns with approaches taken both in Australia (e.g. the Department of Home Affairs' visa assessments) and internationally (e.g. Canada's *Policy on Sensitive Technology Research and Affiliations of Concern*).

ARC research security risk assessment processes

The ARC implements research security risk assessment processes at various stages of the NCGP grant lifecycle to identify and respond to potential risks to Australia's security, defence and international relations. Risk assessment processes are applied within the context of the ARC's management of applications, research funding and ARC committee membership.

Applications

ARC applications are screened on the basis of a number of key factors, including relevance to critical technology, the potential for defence or dual-use outcomes, geopolitical sensitivities, and any international affiliations, associations and funding sources.

Following initial screening, the ARC undertakes risk assessments involving a consideration of open-source resources, input from universities, and policy positions and advice available from other Australian Government agencies.

The ARC will engage with universities during the process to remove, mitigate or manage risks. Where risks cannot be appropriately managed, applications will be referred to the Minister for a decision to refuse funding.

Funded projects

According to the University Foreign Interference Taskforce (UFIT) *Guidelines to counter foreign interference in the Australian university sector*, universities have responsibility for managing foreign interference risks throughout the course of research they conduct. Administering Organisations must report any risks that arise during ARC-funded projects, including changes in associations or affiliations, as required under ARC Grant Agreements.

The ARC will monitor research security risks during funded projects. Risks identified may relate to individual funded projects or to university risk management processes failing to meet expected standards in the administration of NCGP funding. The ARC may undertake assessments of risk relating to Australia's security, defence and international relations in light of:

- alterations to the risk profile of funded projects due to changes in individual or organisational participation

- new information identified through the course of ARC business
- advice on additional risk factors from other Australian Government agencies
- universities reporting emergent potential research security risks to the ARC.

Where a change in circumstance arises and a new risk assessment is undertaken, the ARC will engage with the university to understand the nature of the issue identified and for advice on the institution's approach to mitigating risk. Where risks cannot be appropriately managed, projects will be referred to the Minister to terminate funding.

Committee membership and peer reviewers

The ARC may also undertake risk assessments on ARC College of Experts or members of other advisory or governance committees prior to appointment or when being considered for extension. These considerations will be used to inform recommendations to the relevant decision-maker, as specified by the ARC Act.

Peer reviewers and committee members are required to confirm that all foreign interests are appropriately disclosed when accepting ARC applications for assessment.

University responsibilities

The ARC expects that universities take lead responsibility for the management of research security risks potentially impacting ARC applications and funded projects.

Key aspects of ARC expectations for universities include:

- maintaining institutional policies and processes in alignment with expectations established under the University Foreign Interference Taskforce *Guidelines to Counter Foreign Interference in the Australian University Sector*
- assessing the risks related to all individuals and organisations on ARC applications and funded projects and developing relevant risk management strategies
- avoiding the submission of applications posing threats to Australia's security, defence and international relations to the ARC
- ensuring individuals transparently disclose foreign affiliations, associations and funding support
- staff training to support compliance with ARC requirements and institutional research security arrangements
- ongoing oversight over research security risks throughout funded projects
- engaging with project partners to ensure risks beyond the funded university are managed effectively
- engaging with the ARC on acceptable risk management options and applying risk management strategies

- considering guidance from relevant Australian Government agencies in reviewing potential risks, such as from the Department of Home Affairs and the Australian Security Intelligence Organisation
- reporting to the ARC promptly when research security risks are identified – such as breaches or incidents relating to ARC funded research or researchers.

ARC applications should demonstrate active engagement with research security matters. Where a potential research security risk is identified by the ARC, the relevant university will generally be contacted for an opportunity to respond to the issues identified and for information on the institution's activities to mitigate potential risk. In engaging with risks, universities should outline potential benefits and management strategies to ensure Australia's national interests are protected.

When issuing a request, the ARC expects institutions to respond to the substance of the risks identified by outlining specific, targeted measures to address potential concerns. General descriptions of institutional policies and processes are insufficient. To support the ARC's consideration, information on how these policies and processes have been applied within the specific context of the issues identified is required. The ARC will not contact researchers directly about the assessment. Administering Organisations may choose to contact researchers as part of their processes.

Researcher responsibilities

Researchers should carefully consider the research security implications of their research networks and collaborations. The ARC expects that individuals involved in ARC business exercise individual responsibility for understanding the research security environment and how their research partnerships may affect funding opportunities.

Disclosing foreign affiliations to the ARC

Specific ARC requirements to declare non-Australian affiliations, associations and funding support are outlined against the relevant questions in the ARC's Research Management System (RMS). These questions must be completed prior to applications being submitted, adding personnel to funded projects, applying for membership to certain ARC committees, and accepting requests for ARC peer review.

ARC applicants, funded researchers, ARC committee members and peer reviewers must maintain current, correct and complete information about their foreign affiliations, associations and funding support within their RMS User Profiles. This includes information relating to non-Australian funding sources, talent program participation and government affiliations, as well as employment and qualifications.

Researchers should periodically review their ongoing collaborations to ensure information disclosed to the ARC remains current, correct and complete.

All affiliations must be declared, including honorary, unpaid and temporary appointments; foreign funding sources in the form of either financial or in-kind benefits; and talent plans involving the receipt of in-kind support.

Why does the ARC review this information?

This information is reviewed by the ARC to support assessments of potential risks to Australia's security, defence and international relations associated with an application, funded project or ARC committee membership.

What are the ARC's expectations?

Individuals are responsible for ensuring that all foreign affiliations, associations and funding are declared as required in applications submitted to the ARC and throughout the course of funded projects. Declaring a foreign affiliation does not necessarily mean that a grant application is less likely to be successful. If the ARC believes that international affiliations have not been appropriately declared, it will engage with Administering Organisations to clarify the information identified and to ensure a right of reply.

If a stakeholder is not certain whether an affiliation needs to be declared, they can contact their university research office for advice. ARC requirements are also outlined in policy documents such as the *ARC Conflict of Interest and Confidentiality Policy* (and successor documents). In general, if stakeholders are at all uncertain as to whether a foreign affiliation, association or funding source should be declared, the ARC would encourage making a declaration.

What actions can the ARC take in response to non-declaration?

The ARC may recommend that a grant application not be approved if it considers that the application is incomplete or contains false or misleading information, in accordance with the relevant grant opportunity guidelines. This includes declarations relating to international affiliations. Funded projects involving researchers with undeclared affiliations may be terminated, in line with the terms and conditions of ARC Grant Agreements and the ARC Act. Failure to make foreign affiliation declarations as required can also result in the initiation of processes under the *ARC Research Integrity Policy*.