

Queen Mary Research Security and Export Controls Policy

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1. Introduction and values

- 1.1. Queen Mary University of London ('Queen Mary', 'the University') increasingly engages in global partnerships and collaboration. While the great majority of these activities are not subject to government policy and legislative restrictions, Queen Mary is committed to observing all export control and sanctions regulations that apply to its work.
- 1.2. All relevant staff must familiarise themselves with this policy, actively participate in training, and fully cooperate with the Trusted Research and Compliance Board and the teams responsible for the operation of this policy. Compliance is crucial for ensuring Queen Mary's international collaborative activities stay within the law, not only for avoiding severe penalties and protecting our reputation, but also for ensuring our ability to confidently expand our international presence in an increasingly competitive technological landscape.

2. Purpose

- 2.1. This policy outlines the procedures for identifying restricted activities and ensuring compliance in a proportionate manner.

3. Legislative context

- 3.1. The policy references and aligns with the following regulatory frameworks and guidance:
 - a) UK Strategic Export Control List.
 - b) UK and US sanctions regimes.
 - c) National Security and Investment Act (NSI Act) guidance on notifiable acquisitions.
 - d) Academic Technology Approval Scheme (ATAS).

4. Scope

- 4.1. This policy applies to everyone at Queen Mary. For the avoidance of doubt, this includes all academic staff, researchers, research students, visiting researchers and research students, research support staff, Queen Mary Innovation staff, research managers, support staff and administrators.

5. Principles

- 5.1. The legislative regulations are not intended to restrict academic freedom but to support it. If sensitive technology falls into the wrong hands, it could undermine national security or human rights, support terrorism or crime, or assist in the proliferation of Weapons of Mass Destruction (WMD). This could lead to more restrictive regulations. By ensuring that collaboration and exchange is conducted responsibly, we help to ensure that no undue legal restrictions are placed on our activities.
- 5.2. Failure to knowingly adhere is a disciplinary and legal offence. Penalties range from unlimited fines for QMUL, compounded by reputational damage which could have a serious impact on the QMUL's overseas partnerships. Ultimately there is the ability for the government to impose up to 10 years' imprisonment for individual staff convicted of knowingly ignoring the policy.
- 5.3. Failure to adhere to this policy can have significant consequences for Queen Mary and for individual researchers, potentially including loss of funding and inability to deliver on research grants and contracts, through to criminal convictions. On the other hand, compliance provides assurance to our staff, partners and collaborators, and strengthens Queen Mary's position in applying for research funding and participating in collaborative bids.
- 5.4. This policy outlines the procedures for identifying restricted activities and ensuring compliance in a proportionate manner. To support compliance, training and clear points of contact for further advice have been made available within the Joint Research Management Office. Online and in-person training are available to staff to help them understand the compliance requirements.

6. Roles and responsibilities

- 6.1. The Queen Mary Trusted Research and Compliance Board serves as the body responsible for ensuring regulatory compliance relating to research security. The Head of International Research and Innovation at Joint Research Management Office in the Research Services Directorate has operational responsibility. The International Research team is responsible for maintaining up to date information on the regulations, monitoring mandatory training, and supporting staff to

understand their responsibilities under this policy.

7. UK Controlled Exports/Transfers

There are primarily two categories of controlled items:

7.1. 'Items' on UK Strategic Export Control List:

- a) **Dual-use items:** 'Items' intended for civil use, but which could potentially be used for military, weapons of mass destruction (WMD) or security-related purposes. The main relevant disciplines are: nuclear engineering; viruses, pathogens, vaccines; chemicals with toxic properties; high strength materials; high specification electronics, computers, and telecommunications; automation; cryptography; optics and sonar; navigation; submersibles; aerospace; and space.
- b) **Military items:** any item specifically designed or modified for military use, regardless of the extent of the modification.

7.2. 'Items' with WMD end-use or end-user concerns:

- a) WMD end-use concerns: any 'item', even if not on UK Strategic Export Control List, is subject to control if you have been informed, you know or you have reason to suspect that it is or may be intended to be used in a WMD programme outside the UK. This includes exports/transfers outside the UK as well as teaching and research within the UK. These controls do not apply if there is only a theoretical possibility that items could be used in a WMD programme. Staff should remain vigilant for any indications that the item may be diverted for such use.
- b) Destinations subject to sanction or other restrictions: you have been informed or are aware that the export may be intended for military use in an embargoed destination (Appendix A) or where exports are prohibited by sanction legislation.

7.3. 'Items', as used in this policy, includes the following:

- a) **Goods:** equipment, components, materials, samples, chemicals and biological agents that meet the definitions of dual-use, military or WMD end-use as set out above;
- b) **Technology:** the specific information required for the development, production or use of controlled goods. The controls only apply to the information which is peculiarly responsible for achieving or extending the performance levels, characteristics or functions of controlled goods (except in

the case of nuclear technology, to which the term ‘required’ does not apply). Controlled technology can take any form including data, research papers, designs, manuals, formulae and prototypes; and

- c) **Software:** that is specially designed for the development, production or use of controlled goods.

7.4. The controls apply to the following activities:

- a) **Physical exports** out of the UK of controlled items, on a permanent or temporary basis, including very small quantities. Such exports include hand carrying controlled software or technology on paper or on a laptop, mobile phone or memory device when travelling;
- b) **Electronic transfers** out of the UK of controlled software and technology by any means including email, video conference, teaching overseas and online learning, downloading or accessing of documents by a person located overseas, and by telephone if information is communicated so as to achieve substantially the same result as if the recipient had read it. Electronic transfer includes computer-based services and activities that take place online, in the cloud or through distributed computing if it is subsequently downloaded or accessed by persons located outside of the UK. Controlled software and technology must be stored securely to prevent unauthorised access, using end-to-end encryption and identity and access management;
- c) **Exports and transfers within or outside the UK** of any item subject to WMD end-use controls as described above;
- d) **US-controlled items:** a US licence may be required to transfer US-controlled items to anyone in Queen Mary who is a foreign or dual national, or to anyone outside Queen Mary, in the UK or overseas; and
- e) **Sanctions:** financial sanctions prohibit the transfer of funds or economic resources directly or indirectly to or for the benefit of a sanctioned individual or organisation. Trade sanctions restrict the supply of certain items, primarily military equipment, to sanctioned countries. US sanctions may also apply to supplying any US-origin or US-controlled item to sanctions targets in the UK and worldwide.
- f) Export controls also apply throughout the duration of research projects. Material changes to project deliverables, end use, or overseas partners may bring such projects within the scope of export controls and will require a compliance check.

8. Exemptions for the UK Controlled Exports/Transfers

- 8.1. **In the Public Domain:** controls do not apply to software or technology that is “available without restriction upon further dissemination (no account being taken of restrictions arising solely from copyright)”. The main considerations are:
- a) the software or technology must be available to anyone, for example on a website, at an exhibition or at a conference open to the public;
 - b) the exemption applies if the software or technology is available to anyone in return for payment, for example in a subscription journal;
 - c) research intended to be published is not exempt until after it is published. Sending unpublished research work overseas, for example in the course of teaching, research collaboration or for peer review, is not exempt (unless the ‘Basic Scientific Research’ exemption applies); and
 - d) the act of publication is not itself subject to licensing unless the technology is otherwise restricted, for example if it is subject to the Official Secrets Act.
- 8.2. **Basic Scientific Research:** controls do not apply to technology that is “experimental or theoretical work undertaken principally to acquire knowledge of the fundamental principles or phenomena or observable facts and not primarily directed towards a specific practical aim or objective”. The main considerations are:
- a) this exemption applies to research work that is not directed towards a specific short-term practical aim nor addresses a specific technical problem;
 - b) the technology developed in the course of a research project is likely to be exempt if the sole intended output is a published article in a peer reviewed scientific journal;
 - c) Technology Readiness Levels (TRL) 1-2 are generally considered to be exempt while TRL 3 is borderline and should be considered case-by-case; and
 - d) this exemption only applies to controlled dual-use technologies. It does not apply where there are weapons of mass destruction (WMD) end-use and/or end-user concerns. Basic Scientific Research exemption pertains to a limited range of research fields. Staff should consult with the International Research team during their assessment process.
- 8.3. **Patent Applications:** the controls do not apply to the minimum technical information required to support a patent application. This exemption does not apply to nuclear technology.

9. US Export Controls

- 9.1. US legal restrictions apply to certain items in the UK as follows:
- a) US-origin military or dual-use items that have been imported into the UK directly or indirectly from the US;
 - b) items made or developed outside the US that incorporate any US-origin military content or over 25% (in most cases) by value US-origin dual-use content; and
 - c) items made or developed outside the US using US-controlled technology.
- 9.2. Although US law provides for a wide range of exemptions, a US export licence may be required to transfer such items not only out of the UK but also within the UK, including to a foreign or dual national within Queen Mary (staff, students or visitors). Failure to comply with US requirements can result in severe fines. But at the same time, due care must be taken to ensure compliance with UK anti-discrimination law if US restrictions prohibit access to an item by a foreign or dual national.
- 9.3. Some US sanctions prohibit the supply of all US-origin items (for example US-made laboratory equipment) to US sanctions targets. Such targets include some organisations and their staff operating in the UK and some foreign research institutions (notably in China) that may collaborate with UK universities, including sending staff or students to the UK. The use of US-origin items in working with such persons is not expressly prohibited but care needs to be taken to avoid giving them ownership or possession of such items.

10. National Security and Investment Act (NSI Act)

- 10.1. The NSI Act gives the government the right to scrutinise and intervene in certain acquisitions made by anyone, including universities, businesses, and investors, that could harm the UK's national security. The government can impose certain conditions on acquisitions and if necessary, may unwind or block an acquisition completely. Queen Mary staff should be aware of the Act when collaborating with other parties to acquire, sell or develop certain qualifying entities and assets. The government has powers to assess an acquisition whether it is completed, in progress or in contemplation stage if it reasonably suspects that such can or might give rise to a national security risk.
- 10.2. NSI Act applies to:
- a) **qualifying entity** including but not limited to, a foreign or UK:
 - university, which is registered as a charitable organisation

- private university
 - trust
 - university spin-out
 - university subsidiary (for example a company that a university has incorporated and carries out specific activities that the university operates)
 - research organisation
 - private company or corporation doing contractual work with a higher education institution or research organisation.
- b) **qualifying assets** including land, tangible, moveable property, and ideas, information or techniques which have industrial, commercial or other economic value ('intellectual property').
- c) **The 17 sensitive areas of the economy:** the external party acquiring a qualifying entity or asset in an area that is likely to give rise to national security risks, they or the University might be required by law to notify the government. The 17 sensitive areas of the economy that the government has identified are:
- Advanced Materials;
 - Advanced Robotics;
 - Artificial Intelligence;
 - Civil Nuclear;
 - Communications;
 - Computing Hardware;
 - Critical Suppliers to Government;
 - Cryptographic Authentication;
 - Data Infrastructure;
 - Defence;
 - Energy;
 - Military and Dual-Use;
 - Quantum Technologies;
 - Satellite and Space Technologies;
 - Suppliers to the Emergency Services;
 - Synthetic Biology;

- Transport.

10.3. **Examples of university research activities as qualifying assets:** Private companies, governments and other organisations are frequently involved in universities' research at early stages, often at a pre-commercial stage. Examples of these are contract or sponsored research, sponsoring a research position (e.g. a chair), and sponsoring a research theme. Universities can also be part of research centres in partnership with other public and private stakeholders. In addition, universities can develop spin-out companies for which they might retain some IP ownership. They can also host PhDs and other academic placements from various sources for which the IP might not reside entirely with the university. If through these agreements a person gains control over a university or research organisation's qualifying assets, which can include both tangible moveable and intellectual property, for example where such assets are licensed out (exclusively or non-exclusively) by a university, then this is a qualifying acquisition under the NSI Act. It is also a qualifying acquisition if a party gains control over a qualifying asset generated by the research it has funded. Any agreement that provides for this is also in scope of the NSI Act as a contemplated qualifying acquisition.

11. Awareness, Guidance and Training

- 11.1. The International Research team is responsible for maintaining up to date information on the regulations. The International Research team shall attend relevant external courses as appropriate, monitor mandatory training, and support staff to understand their responsibilities under this policy, what materials and wider support is available to them.
- 11.2. All staff, as defined in 4.1, within the Faculty of Science and Engineering are required to undertake the mandatory training course Protecting Your Research. Academic staff, researchers, and research managers will be required to complete more in-depth training in Trusted Research. The International Research team will periodically review which members of staff require awareness materials and/or training on the regulations and shall arrange this as needed, including during induction presentations for new staff. The International Research team shall maintain a record of all such training.
- 11.3. The International Research team shall provide an appropriate level of information on Queen Mary's website, including this Policy. All staff will also be directed to review other relevant Queen Mary policies, such as the Cyber Security Policy and the IT Services Policy on Traveling to High-Risk Countries.
- 11.4. The Trusted Research and Compliance Board and International Research team may consider further steps to raise awareness and to embed export controls and sanctions compliance in QMUL procedures. Examples of such steps may include: appointing Contact Points in Schools and Institutes to assist researchers with

questions and liaison with the International Research team; putting export control issues on Schools' risk registers to ensure that they are included in routine reviews of activities; using the Annual Staff Review process to assess whether relevant staff require training and how effectively they are implementing this policy; sending staff concerned to attend external courses; or establishing a Steering Committee of certain relevant staff (such as Heads of Schools, Directors of Research and Directors of Graduate Studies) to help coordinate the implementation and eventual development of this policy.

12. Academic Technology Approval Scheme (ATAS)

- 12.1. The risk of a transfer of sensitive technology that might be used in a weapons of mass destruction (WMD) programme occurring in the course of teaching or research in the UK is primarily managed by the UK government through the ATAS. Students, researchers and staff from certain countries applying to study or work in the UK at postgraduate level in relevant disciplines require an ATAS certificate before they will be granted a visa. Compliance with ATAS at QMUL is managed by Registry Services, Student Experience Directorate.).
- 12.2. A new ATAS certificate may be required if a student or researcher changes course or project while they are in the UK.
- 12.3. ATAS clearance applies only to activities in the UK. Obtaining ATAS clearance does not preclude the potential need for export control licence application. If ATAS cleared individuals (staff or students) engage in overseas activities, e.g. data transfers, collaborative research, attending conference overseas, separate export control compliance assessment will be required, including applying for export control licence application for conducting overseas activities above.

13. Prospective Partner and Technology Assessments

- 13.1. All prospective partners based in or with links to a sanctioned or embargoed country listed in Appendix A shall be screened against the UK and US sanctions lists. This applies to all individuals and organisations with respect to research grants and agreements, procurement, other sources of income, overseas partnerships and activities. The sanctioned or embargoed countries are divided into three categories:
 - a) **Highly Sensitive:** the non-government controlled territories of Ukraine, Iran, North Korea, Russia: any proposals for research activities involving, directly or indirectly, any individual or organisation based in or with links to these countries must be referred, with full details of the proposal, to the International Research team;

- b) **Restricted:** partners in all other sanctioned and embargoed countries are more likely to raise research security concerns. Consider if there is evidence that they may be linked to the national military, any military industries, or does their research institution have links to the military or known to be involved in a weapons of mass destruction (WMD) programme. Activities in scope of the 17 sensitive areas of economy outlined in the National Security and Investment Act are more likely to raise national security and export control concerns.
 - c) **Other:** Activities with partners not listed in Appendix A need to be assessed individually against UK Export Control list. Please also consider if there is evidence that the partners are linked to any military/defence industries or if their research institution have links to the national military or defence, or are known to be involved in a WMD programme, as restriction might still apply.
- 13.2. Proposed research activities, Material Transfer Agreements (MTAs), intellectual property licensing and education involving persons located outside of the UK must be evaluated to ensure compliance with research security and export controls. Such consideration shall apply to activities involving both of the following criteria:
 - a) activities in a relevant discipline as specified in section 10.2;
 - b) potential export or transfer out of the UK or under US export controls.
- 13.3. When seeking advice from the International Research team, the Principal Investigator (PI) or proposer shall follow the process in the Research Security and Export Controls Compliance Flowchart (Appendix B) and complete an Export Controls Enquiry form (Appendix C). The International Research team in consultation with the PI/proposer, shall then determine whether export controls and NSI Act are in fact applicable. In cases of doubt, an enquiry shall be submitted to the relevant government agent or regulator.
- 13.4. In addition, Directors of Research in Schools and Institutes will routinely assess all other proposals that may involve an export/transfer out of the UK and, whenever they judge that there is a risk that export controls may be applicable, the PI/proposer shall be required to complete an Export Controls Enquiry form.
- 13.5. All 'items' identified as subject to export controls must be clearly flagged as such in all associated documents, records and labels.
- 13.6. Any transfers of controlled items should be covered by contractual provisions, e.g. research contract or MTA, through enhanced contractual provisions as detailed in Appendix D.
- 13.7. With respect to US controls, all concerned must be alert to the risk of the receipt of an item that is subject to US export controls and require that external partners inform them of whether any item they propose to send to Queen Mary is US-controlled. No activities involving US-controlled items may proceed without the prior written consent of the Head of International Research team. If US export

controls are applicable, the International Research team will consult with those concerned, seek external expert advice if necessary, and prepare a compliance plan.

- 13.8. Some proposed partnerships/projects may be escalated to the Trusted Research and Compliance Board, who shall decide whether the proposed activities may proceed, if appropriate in consultation with Queen Mary's banks, insurers and where appropriate with Partnerships Board, Research and Innovation Board or Senior Executive Team. If an activity with a sanctioned person or in an embargoed destination is approved, enhanced compliance measures shall be followed in all dealings with the sanctioned person.
- 13.9. Records of all research security and export control assessments and decisions shall be stored by the International Research team for at least four years.

14. Export licence applications, use and audits

- 14.1. If an export licence is required, the International Research team shall determine, on the basis of the export control classification of the specific item(s) and destination(s) concerned, which type of licence is required and shall register (in the case of Open General licences) or apply (in the case of Individual licences). The PI or proposer must provide all relevant details related to the proposed export or transfer.
- 14.2. When an export licence is obtained, the International Research team shall provide a copy to the PI or proposer and agree with them on how the conditions of the licence will be fulfilled, in particular:
 - a) **in all cases:** ensure that the items to be transferred, their destination country and recipients are covered by the licence;
 - b) **for physical exports:** ensure that the licence title and number are referenced on the shipping documents and on the export declaration completed by the freight forwarder;
 - c) **for electronic transfers:** ensure that the UK export control classification number and the export licence title and number are referenced on the documents and any covering emails; and
 - d) **for international travel:** any staff or student proposing to carry a controlled item overseas or to access controlled technology while they are overseas shall consult the International Research team who shall ensure that the appropriate export licences are in place. This may include also obtaining an export licence from the destination country if it is intended to carry a controlled item back from there to the UK.

- 14.3. All records of exports and transfers, as required by the licence, shall be stored by the PI and the International Research team for at least four years. The International Research team shall periodically verify these records are maintained correctly.
- 14.4. If Queen Mary obtains one or more export licences, Queen Mary will become subject to external audits by the Export Control Joint Unit to check compliance with the conditions of the licence(s) and that no controlled items are being exported without a licence.
- 14.5. If an external or internal audit finds any failures of compliance, or if these come to light in the course of routine business, the Trusted Research and Compliance Board and the International Research team shall be responsible for immediate investigation and corrective action, and submitting a voluntary disclosure to HM Revenue and Customs (for breaches of export controls or trade sanctions) and/or to the Office for Financial Sanctions Implementation (for breaches of financial sanctions), seeking appropriate external advice as appropriate.

15. Submitting NSI Act notifications

- 15.1. Submitting a mandatory or voluntary notification: there are two different ways to notify the government about an acquisition:
 - a) Mandatory notification: when Universities are legally required to tell the government about notifiable acquisitions in the 17 sensitive areas of the economy.
 - b) Voluntary notification: when Universities are a party to a completed or planned qualifying acquisition that is not covered by a mandatory notification e.g. when selling assets.
- 15.2. Queen Mary takes a risk-based approach to NSI Act notifications. The International Research team will support due diligence in 'qualifying entity' and 'qualifying assets', and will liaise with external parties and submit the notification to the government.

16. Associated information

- 16.1. The Appendices set out as part of this policy will be reviewed regularly in accordance with regulatory changes and best practices. All future revisions to these procedures will be dated for clear version control.
- 16.2. The Appendices include:
 - a) Appendix A: Sanctioned and Embargoed Countries

- b) Appendix B: Research Security and Export Controls Compliance Flowchart
- c) Appendix C: Export Controls Enquiry Form
- d) Appendix D: Enhanced Contractual Provisions
- e) Appendix E: NSI Act Flowchart: How to decide whether you must or may wish to notify the Government of an acquisition from 4 Jan 2022

17. Review

- 17.1. This policy will be reviewed at least every three years.
- 17.2. Minor updates to this policy that do not affect the rules, principles or intent of this policy may be approved by Director of Research and Innovation on behalf of the Queen Mary Trusted Research and Compliance Board.

Appendix A: Sanctioned and Embargoed Destinations

Version: November 2024

MOST SENSITIVE COUNTRIES (subject to comprehensive trade and financial restriction)

Crimea, Donetsk, Luhansk
(non-government controlled territory of
Ukraine)
Iran
North Korea (DPRK)
Russia
Syria

RESTRICTED COUNTRIES

Afghanistan
Armenia
Azerbaijan
Belarus
Central African Republic
China (including Hong Kong and Macao)
Democratic Republic of the Congo
Iraq
Lebanon
Libya
Myanmar (Burma)
Somalia
South Sudan
Sudan
Venezuela
Zimbabwe

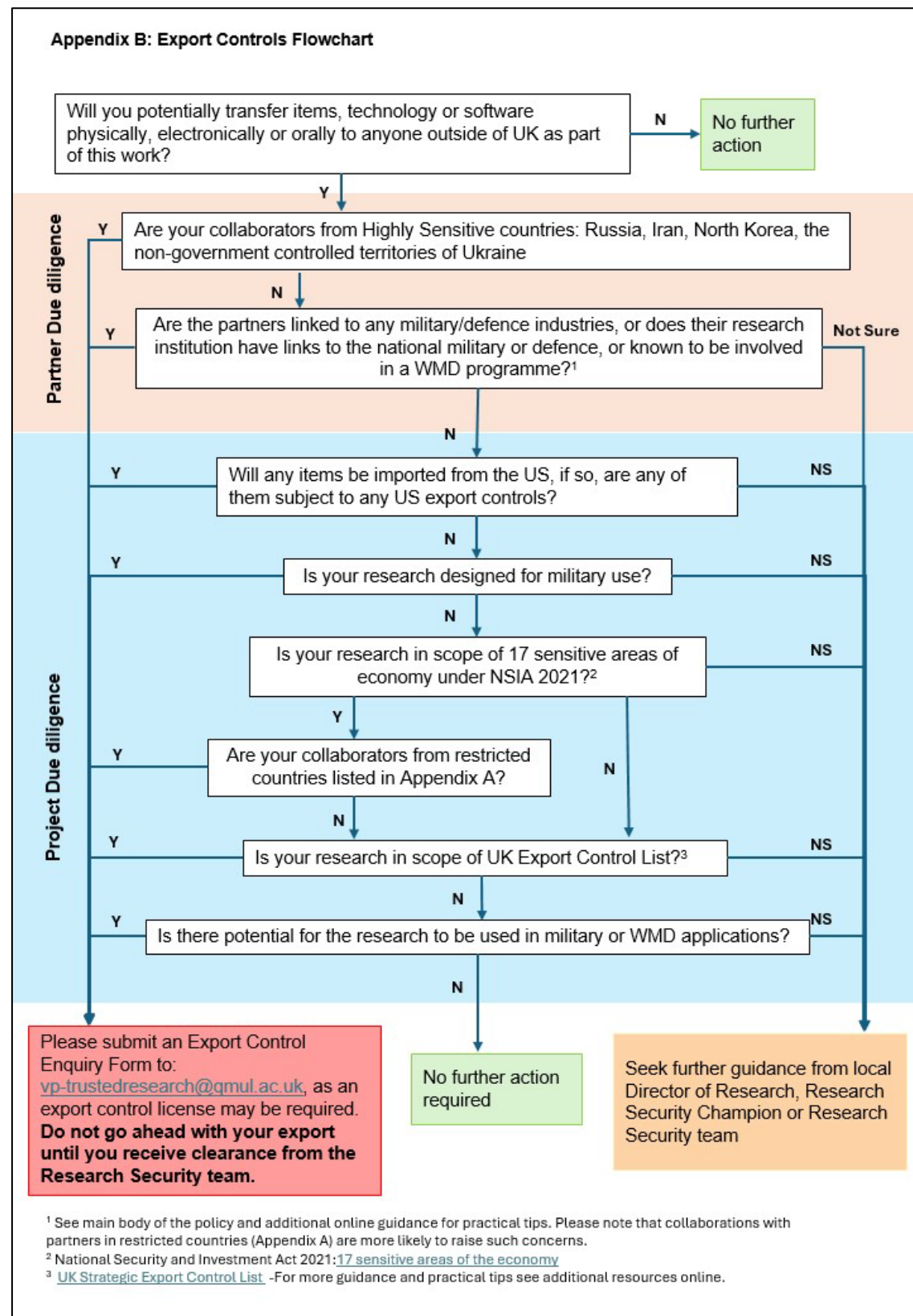
This list is intended to give an indication of countries of greatest potential risk. It was updated in September 2024 and will be updated in line with UK government guidance. Please also check potential collaborations against the UK Government list.

Sanctions assessments should be conducted by checking the name, address and country of the prospective partner individual or organisation against three sources:

Source	Link
UK financial sanctions list	https://search-uk-sanctions-list.service.gov.uk/
UK trade sanctions list	https://www.gov.uk/guidance/current-arms-embargoes-and-other-restrictions
US Consolidated Screening list	https://www.trade.gov/data-visualization/csl-search

Appendix B: Research Security and Export Controls Compliance Flowchart

Version: November 2024



Appendix C: Export Controls Enquiry Form

Version: November 2024

This form should be completed by the Principal Investigator or proposer of research projects as required by Section 10 of the Policy. This form is designed to help the International Research team to decide whether the goods, technology, software or knowledge (referred to as “**items**” in the form below) being exported requires a licence. Additional information may be required for a decision to be made. To submit the form and if you have any questions, please contact vp-trustedresearch@qmul.ac.uk.

Do not go ahead with your export until you receive clearance.

Section 1: Project Information				
Project Title				
Project number on Worktribe				
PI or Proposer				
Department				
Email				
Funder (if any)				
Date				
Section 2: Item Information				
Description of the item(s). This must include specific technical details. This can be attached as a separate technical specification document.				
Intended overseas recipient(s) and their address				
Section 3: End-Use				
1.	What is the intended use of the item(s)?			
		Yes	No	Unsure
2.	Have you been informed, do you know or do you have reason to suspect that the items are or may be intended to be used in a programme related to Weapons of Mass Destruction i.e. nuclear, chemical or biological weapons or missiles capable of delivering them?			
3.	Have you been informed, do you know or do you suspect that the items are intended to be used for any military purpose?			
Section 4: US-controlled items				
		Yes	No	Unsure
1.	Will any item or component originate from the United States?			
2.	If yes, is any item known to be subject to US export controls? (The supplier should be asked to advise.) If the US Export Control Classification Number is known, please provide it here.			
Section 5: Exemptions				
		Yes	No	Unsure

1.	Does all software and technology related to this proposal meet the definition of 'already in the public domain': <i>"available without restriction upon further dissemination (no account being taken of restrictions arising solely from copyright)"</i> .			
2.	Does all technology related to this proposal meet the definition of 'basic scientific research': <i>"experimental or theoretical work undertaken principally to acquire knowledge of the fundamental principles or phenomena or observable facts and not primarily directed towards a specific practical aim or objective"</i> .			
Section 6: Military and Dual-Use Controls				
		Yes	No	Unsure
1.	Is any item specially designed or modified for military use? If yes, please provide more information here.			
2.	Is any item listed in the UK Strategic Export Control List? - if any item may meet the criteria, provide your best estimation of its classification. - if an classification is close but your export does not meet the control threshold, please also provide the reference and explain why item is not controlled under this classification. Please refer to the ' Goods Checker ' tool and check all relevant key terms, Please provide more information here.			

Appendix D: Enhanced adequate contractual clauses

Version: November 2024

If you are involved in research that is, or might be, subject to the export control regime, you must ensure that all agreements (including any Material Transfer Agreements) adequately address export control and research security, before and throughout the duration of the research project.

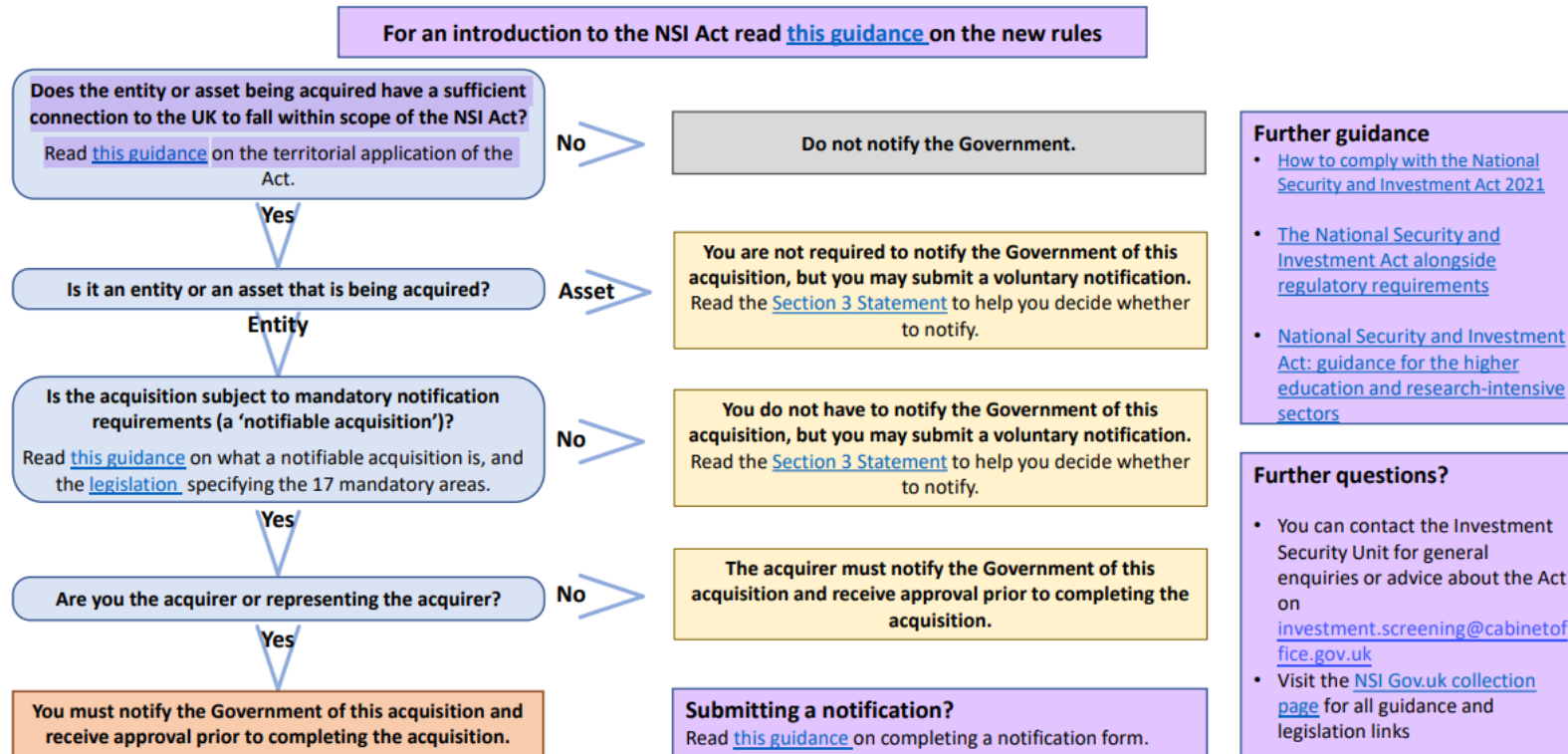
All agreements must require:

- The parties to comply with any applicable export control requirements, including obtaining any necessary licences or approvals prior to exporting anything subject to an export control regime. Any breach of this requirement must allow a party to immediately terminate the agreement.
- That when a party is sending material or information that is subject to export control strictions, it will first notify the recipient.
- The parties to provide each other reasonable assistance in complying with export control requirements, or any funder conditions relating to export control.

Many widely used template agreements do not include all of these obligations, so it is likely that changes will need to be made. Queen Mary's JRMO Contracts Managers have template wording that they can provide

Appendix E: NSI Act Flowchart: How to decide whether you must or may wish to notify the Government of an acquisition from 4 Jan 2022

How to decide whether you must or may wish to notify the Government of an acquisition from 4 Jan 2022



National Security and Investment Act

UK Government (2024) *National Security and Investment (NSI) Act: process flowchart*. Available at: <https://assets.publishing.service.gov.uk/media/65d87da654f1e700111658fa/nsi-process-flowchart.pdf>

Policy Information and Document Control

Policy title	Queen Mary Research Security and Export Controls Policy
Version number	Version 1.3
Related policies and procedures	Information Security & Data Governance Policies; IT Services Policy on Staff Traveling to High-Risk Countries; Trusted Research Guidance for Hosting International Visitors.
Approval level	Queen Mary Trusted Research and Compliance Board
Approval date	18 January 2025
Effective date	18 January 2025
Next review due	January 2028
Policy owner	Head of International Research and Innovation; JRMO, Research Services
Policy contact	vp-trustedresearch@qmul.ac.uk

Version control

Version	Date	Reason for updates/Summary of key changes
1.3	May 2026	Moved to new policy template and small (non-significant) changes not requiring formal approval.
1.2	January 2025	Updated governance (Queen Mary Trusted Research and Compliance Board) and operational (International Research and Innovation team) roles and responsibilities relating to this policy. Full policy review aligning with regulations; updated information on 'controlled items' and 'destinations with end-user concern'. Incorporated major additions to the context of research security to include information on National Security and Investment Act and notification process. Major revision on 'Prospective Partner and Technology Assessments' to clarify due diligence process. Updated Appendices
1.1	December 2023	New policy developed and approved.