

Analysis of current and publicly available documents on securing international science cooperation

Part I: Annotated collection of checklists and guidelines for the international science and technology cooperation

Part II: Meta-Guidelines supporting the safe and successful international science and technology cooperation

EU Research and Innovation Knowledge Network on China

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Part I: Annotated collection of checklists and guidelines for the international science and technology cooperation

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Preface

In the past years, various guidelines have been published with the aim of improving international research and innovation cooperation. These guidelines have been produced by very different groups and individuals, address different target groups, focus on different topics, and some have specific political intentions. Some of these guidelines give rather general advice, others are very detailed. Some of them are state agnostic, others address the cooperation with specific countries. They are addressed to individuals but sometimes also to institutions or policy makers; most are addressed specifically to members of higher education institutions or individual researchers.

It is not easy for the European user from a university or research organization to find and classify the appropriate recommendations. To facilitate this, an analysis of recently published and publicly accessible documents has been carried out. The results of the analysis are presented in 2 parts:

Part I: Annotated collection of checklists and guidelines for the international science and technology cooperation

Part II: Meta-Guidelines supporting the safe and successful international science and technology cooperation

Part I: Annotated collection of checklists and guidelines for the international science and technology cooperation

In the analysis provided here, both country specific as well as country neutral guidelines, checklists and other relevant documents are presented with a short profile and summary. 26 documents have been analysed. The collection uses the English language, although some documents were written in other languages as indicated in the profile. The brief categorisation of the documents in the profiles is not based on a structured standard, but is the result of a rough assessment of the editors by comparing the documents. It is intended to give some initial pointers during a quick perusal.

The analysis makes no claim to completeness but is instead intended to give an overview on the current situation.

Readers of this analysis are invited to inform the editors about other publicly available relevant and recently published documents.

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Australia

University Foreign Interference Taskforce

Guidelines to counter foreign interference in the Australian University Sector (2019)

Target audience:	Australian universities
Regional focus:	no specific focus
Thematic focus:	governance and risk frameworks, due diligence, communication, knowledge sharing, and cyber security to counteract foreign interference
Structure:	key themes and objectives supported by guiding questions; best practice considerations; links to additional resources; case studies and scenarios
Level of guidance:	detailed, practical guidance
Language:	English
Page total:	44 pages
Most relevant:	p. 10-32, 38-40

The University Foreign Interference Taskforce was specifically established for the purpose of publishing these guidelines in 2019 and includes representatives from relevant government agencies as well as universities. The document is split into two parts: key themes and objectives that are supported by guiding questions to provide guidance for universities to address the specific foreign interference risks they face, and more detailed best practice considerations to support decision-making processes. The guidelines are intended to support Australian universities in mitigating the risk of undue foreign interference without missing out on the benefits of international research collaboration, and should be used as a tool for risk assessment as well as examination of existing policies and protocols.

The total of 87 guiding questions include recommendations such as:

- Develop new and reevaluate/amend existing policies, procedures, risk assessments and internal reporting mechanisms to safeguard against foreign interference, clearly define responsibilities
- Apply appropriate due diligence proportionate to the combined sensitivity of research topics and research partners
- Ensure compliance with export control regulations, especially where dual use technologies are concerned, consider and monitor the potential end use of research throughout the research cycle
- Improve training as well as communication and reporting protocols, raise awareness and provide information on foreign interference activities
- Improve knowledge sharing and collaboration, especially where information about foreign interference activities and potential or past partners is concerned, across the sector
- Develop, invest in and implement strong cyber security strategies

The Australian Strategic Policy Institute (ASPI)

Author: Alex Joske (International Cyber Policy Centre)

Hunting the phoenix – The Chinese Communist Party’s global search for technology and talent (2020)

Target audience:	governments, universities worldwide
Regional focus:	China-specific
Thematic focus:	Chinese talent-recruitment programs
Structure:	information on talent programs and associated risks; case studies; recommendations
Level of guidance:	relatively detailed
Language:	English
Page total:	64 pages
Most relevant:	p. 27-28

ASPI is an Australian defense, national security and strategic policy think tank. “Hunting the phoenix” points out that greater awareness of potential “brain drain” through Chinese overseas talent-recruitment programs, greater transparency where these programs are concerned, and increased funding to support the retention of talent and technology are necessary. Several case studies and a list of recommendations for governments and universities are included. These recommendations should be introduced alongside existing regulations to promote transparency and accountability, as well as help manage conflicts of interest. The need for increased compliance and enforcement of existing regulations, as well as implementation of these new recommendations, is strongly emphasized.

Some of the proposed recommendations for governments:

- Carry out studies on talent-recruitment programs, brief universities and research institutions
- Ensure that cases of theft, fraud, espionage, and non-compliance are investigated
- Prohibit government employees from joining talent programs
- Include disclosure requirements for any type of funding, as well as staff participation in foreign talent programs
- Establish a public online database of foreign funding received by universities and their employees
- Establish a national research integrity office

Some of the proposed recommendations for universities:

- Carry out audits of participation in talent-recruitment programs by staff
- Update relevant policies and brief staff, especially where disclosure of contracts and foreign remuneration is concerned
- Investigate cases of fraud, misconduct, and nondisclosure, examine why existing regulations and systems failed to prevent them
- Strengthen existing staff travel databases to flag conflicts

[Picking flowers, making honey - the Chinese military's collaboration with foreign universities \(2018\)](#)

Target audience:	governments, universities worldwide
Regional focus:	China-specific
Thematic focus:	research collaboration with People's Liberation Army (PLA)
Structure:	information on PLA strategies and associated risks; recommendations
Level of guidance:	relatively detailed
Language:	English
Page total:	25 pages
Most relevant:	p. 18-20

Also published by ASPI, "Picking flowers, making honey" seeks to inform governments and universities about the risks involved in research collaboration with Chinese universities, research institutes and individual researchers that have ties to China's People's Liberation Army (PLA). It provides in-depth information about ways in which PLA-affiliated scientists have attempted to conceal their ties to the Chinese military in the past and offers a list of 37 recommendations in total that governments and universities should implement to protect themselves against the inadvertent transfer of knowledge and technology, especially in cases where it could be used to advance a non-allied military's capabilities.

Some of the proposed recommendations for governments:

- Deepen national as well as international discussion on PLA collaboration, increase awareness, develop interagency responses, and share relevant information globally
- Improve the visa application screening process to detect deception by PLA scientists
- Re-examine and amend existing export control policies, continuously train and provide resources for university staff that is tasked with export control compliance
- Introduce policies to regulate the scientific training that foreign military personnel can receive
- Regulate or prohibit the use of government funding in collaboration with the Chinese military and other non-allied militaries
- Increase funding for research in strategically relevant research fields, limit or prohibit certain forms of foreign investment in the same fields

Some of the proposed recommendations for universities:

- Build an awareness of the extent of PLA collaboration on campus and develop processes, internal policies and security precautions accordingly
- Increase oversight over visiting scholar and student application

Belgium

Flemish Interuniversity Council

Vlaamse Interuniversitaire Raad

[Recommendations for implementing a human rights assessment at the Flemish universities \(2019\)](#)

Target audience:	Flemish universities
Regional focus:	no specific focus
Thematic focus:	human rights
Structure:	information on human rights; guidance on assessment; examples; additional resources; indicator checklist
Level of guidance:	detailed, practical guidance
Language:	English
Page total:	24 pages
Most relevant:	p. 9-23

The Flemish Interuniversity Council (VLIR) is an autonomous consultative body that advises the Belgian government on higher education policies and established an ad hoc Working Group on Human Rights in 2018. The working group determined that respecting human rights is fundamental to universities' social responsibility, and that while it is important to raise awareness, this is not sufficient in itself. Therefore, the working group developed a human rights assessment as a practical self-regulation tool to aid universities in implementing new and strengthening existing human rights policies.

The working group also provided an indicator checklist to simplify the screening of potential and existing partners and research activities (p. 19-20) and identified some additional steps that can be taken should the indicator diagram reveal a potential risk for human rights violations within a given research collaboration (p. 21-23).

Some of the proposed recommendations to universities are as follows:

- Establish a contact point for questions regarding the human rights assessment, the university's human rights policies and possible human rights violations in new or ongoing collaborations
- Carry out systematic human rights assessments of both new and ongoing collaborations, partners and research activities
- Include human rights clauses in contracts where relevant

European Union

EU-Commission

Basic Principles for effective International Science, Technology and Innovation Agreements (2014)

Target audience:	EU, EU member states
Regional focus:	non-EU countries
Thematic focus:	international STI agreements
Structure:	information on existing bilateral STI agreements used by the EU, its member states, and the USA; information on the impact of existing STI agreements; potential alternatives; recommendations
Level of guidance:	general
Language:	English
Page total:	62 pages
Most relevant:	p. 43-48

The European Commission tasked a consortium with developing a study about existing bilateral Science, Technology and Innovation (STI) agreements, their impact, and potential alternatives such as umbrella agreements between the EU and non-member states. This was preceded by reports that pointed out the strategic disadvantages of a lack of coordination and the lack of a common framework at the EU level, as well as calls that “Europe should act as one to achieve a global playing field for research and innovation” (p. 6).

The study concludes that a coordinated approach to STI agreements with non-EU countries at the European level would result in increased efficiency and effectiveness of international cooperation activities. STI umbrella agreements, meaning agreements that result out of joint action by the EU and member states, are presented as a potential coordinated approach. While the implementation of joint consent umbrellas (legally binding multilateral agreements that present overarching framework conditions for STI cooperation) may be difficult, basic principles umbrellas (not legally binding guidelines to be used at the European level as a basis for STI agreements) are considered a feasible strategy.

[EU compliance guidance for research involving dual-use items \(2020\)](#)

(EU Dual Use Research guidance-draft version for Targeted Consultation)

Target audience:	individual researchers; research organizations
Regional focus:	no specific focus
Thematic focus:	dual-use export controls
Structure:	information on export control regulations and how they affect research organizations; guidelines; information research areas and scenarios where export control regulations might be relevant;
Level of guidance:	detailed guidance
Language:	English
Page total:	64 pages
Most relevant:	p. 21-40

The document was drafted to support individual researchers and research organizations in identifying, managing and mitigating the specific risks related to the export of dual use technologies, as well as complying with the appropriate export control regulations. The document will be updated periodically.

Among a total of 60 guidelines that address aspects that organizations should consider when setting up or reevaluating their internal export control compliance policies, the compliance guidance recommends to:

- Establish and communicate clear responsibilities and processes where export control compliance is concerned
- Make relevant training for staff that could potentially take part in research concerning dual use compulsory
- Develop and implement regular risk assessments of partners as well as projects. These could include traditional risk assessment methods as well as data mining or other software solutions
- Consider potential end uses of research
- Perform export screening procedures throughout the research cycle on high risk projects
- Encourage staff to report non-compliance incidents or suspicions thereof
- Protect dual-use items from unauthorized removal, consider access restrictions
- Develop cyber security mechanisms including antivirus checks, firewalls, encryption, audit trails and logs, as well as access controls. Ensure that international partners make use of similar protections where relevant

Germany

Commission of Experts for Research and Innovation

Report on Research, Innovation and Technological Performance in Germany 2020 (2020)

Target audience:	German Federal Government
Regional focus:	no overall focus; partly China specific
Thematic focus:	cyber security; knowledge exchange; equal competition; mutually beneficial cooperation; dual-use
Structure:	Information about current developments/challenges; recommendations on measures
Level of guidance:	general guidance
Language:	English (German version)
Page total:	147 pages
Most relevant:	p. 14-15; p. 53-54; p. 71-72

The Commission of Experts for Research and Innovation (EFI) publishes yearly reports on Germany's research, innovation and technological performance. The annual report for 2020 includes cybersecurity and knowledge exchange between Germany and China among its main topics.

Recommended measures applicable or specifically related to China include:

- Build cybersecurity expertise that covers technical, ethical and legal aspects
- Make information on cybersecurity topics and advisory services easily accessible
- Create a level playing field for direct investment in German and Chinese companies
- Establish a central competence center to offer legal advice and specific expertise relating to the cooperation with Chinese partners
- Expand expertise on China

Federal Office for Economic Affairs and Export Control (BAFA)

Export Control in Academia Manual (2019)

Target audience:	academic and research sector; individual scientists
Regional focus:	no specific focus
Thematic focus:	export control, foreign trade law
Structure:	information about export control regulations and their impact on the academic sector; case studies; recommendations for universities
Level of guidance:	detailed guidance
Language:	English
Page total:	108 pages
Most relevant:	p. 84-95

The manual was set up by the German Federal Office for Economic Affairs and Export Control (BAFA) in collaboration with several German research institutes and the Technical University of Berlin to raise awareness among higher education institutions on export control, and to provide support on the application of foreign trade law if needed.

BAFA's recommendations include suggestions such as:

- Ensure compliance with export control regulations and foreign trade law through personal responsibility and frameworks defined by the institution
- Consider setting up an Internal Compliance Program (ICP) to facilitate compliance with relevant regulations, provide risk analyses, keep records, and perform audits
- Identify and clearly assign responsibilities within the research organization, consider appointing an export control officer and provide relevant training
- Include export control compliance regulations in relevant manuals and codes of conduct
- Tailor due diligence on export regulation compliance to the specific fields of research that the organization is involved in
- Keep detailed records of activities that fall under export control regulations
- Ensure that all members of the organization are aware of their duty to comply with export control regulations and know whom to contact
- Implement control mechanisms such as the 4-eyes principle
- Regularly review internal export control compliance policies to ensure that they are up to date and effective
- Develop an anonymous reporting procedure for suspected or actual violations of foreign trade laws and export control regulations
- Protect listed items from theft by use of access controls, authorization concepts, password protection, encryption, firewalls, storage and email policies etc.

German Academic Exchange Service (DAAD)

No red lines - science cooperation under complex framework conditions (2020)

(German original title: Keine roten Linien – Wissenschaftskooperationen unter komplexen Rahmenbedingungen)

Target audience:	German higher education institutions
Regional focus:	no specific focus
Thematic focus:	framework conditions in the partnering country, opportunities and risks of international collaboration, overall performance and fit of the partner institution, embedding the partnership into the institutional strategy
Structure:	criteria catalog, guiding questions, additional resources
Level of guidance:	detailed guidance
Language:	German
Page total:	57 pages
Most relevant:	p. 9-54

The DAAD's Competence Center for International Science Cooperation (KIWi) published these guidelines to support higher education institutions in independently weighing up risks and opportunities in their research cooperation with international partners. The guidelines are supplemented by selected references and represent an experience-based foundation, on the basis of which different actors in higher education institutions can decide which aspects should be considered in their own risk and opportunity assessments. The document has been prepared in collaboration with universities and experts and is to be continuously developed and updated.

The guiding questions provided by the DAAD are arranged along six broad criteria. The first four provide an overview over opportunities, potentials, challenges and risks of international science cooperation projects and cover political, sociopolitical and legal aspects. The fifth and sixth criteria refer more specifically to the evaluation process of the participating partner institutions.

The corresponding guiding questions cover a broad range of topics, such as:

- general aspects to consider when visiting the partnering country (who to contact in case of emergency while abroad, whether cell phones and computers have been adequately secured to make transfer of confidential data possible, etc.)
- status of bilateral relationships/relationships with the EU
- potential sanctions against the partner country and their impact on the science sector
- potential for instrumentalization or political, strategic or ideological goals
- potential for misuse of research results, compliance with export control laws
- legal framework and independence of courts of laws in the partner country
- science policy framework (is there a legal framework to regulate export/regulations for joint publications etc., is academic freedom guaranteed, are certain research fields prioritized, etc.)
- potential civil-military links at the partner institution

German Association of Chinese Studies (DVCS)

Guidance by the German Association for Chinese Studies on the Interaction of German Academic Institutions with the People's Republic of China (2018)

(German original title: Handlungsempfehlungen der Deutschen Vereinigung für Chinastudien e.V. zum Umgang deutscher akademischer Institutionen mit der Volksrepublik China)

Target audience:	German universities and research institutions
Regional focus:	China-specific
Thematic focus:	agenda-setting, legal context, academic integrity
Structure:	guidelines/suggestions
Level of guidance:	somewhat detailed guidance
Language:	German
Page total:	4 pages
Most relevant:	p. 1-4

The German Association for Chinese Studies (DVCS) is a non-profit association for China scholars from German-speaking countries. The DVCS published 16 guidelines in total with the intention of facilitating successful and mutually beneficial German-Chinese research cooperation while accounting for the challenges constituted by different political systems.

Some of the suggestions to universities and research institutions are as follows:

- Add a clause to cooperation agreements with Chinese partners that states that any legal disputes shall be carried out before a German court of law
- Include China experts in the discussions before cooperation agreements are finalized or extended,
- Make the content of cooperation agreements, especially where funding is concerned, transparent and openly accessible
- Include an exit clause in cooperation agreements
- Avoid long-term financial dependencies
- Perform rigorous background checks on Chinese partners
- Protect the academic freedom of Chinese partners
- Inform the head of the institute or an ethics council if lobbying efforts become apparent

German Rectors' Conference (HRK)

Guidelines and standards in international university cooperation (2020)

Target audience:	German higher education institutions, individual university members
Regional focus:	no specific focus
Thematic focus:	strategy and governance; joint teaching and learning; joint research; universities as transnational spaces
Structure:	guidelines within four broad categories
Level of guidance:	general guidance
Language:	English (German version)
Page total:	6 pages
Most relevant:	p. 3-6

The German Rectors' Conference (HRK) is a voluntary association of state and state-recognized universities in Germany. HRK considers international cooperation to be of great value to German higher education institutions and believes that "it is important to proactively identify realms of possibility, without jeopardizing one's own values and standards in the process" (p.2).

The guidelines were developed with the intention of providing German universities and research institutions with a means for critical evaluation of and orientation for setting up and maintaining new and existing cooperation projects and international partnerships. The document will be reviewed and updated at regular intervals.

Some of the proposed guidelines and standards are as follows:

- Equal partnerships with transparent communication
- Balanced funding models that avoid dependencies
- Knowledge of the partner including cultural differences, values and principles
- Robust and transparent due diligence processes, clear allocation of responsibilities
- Adherence to institutional rules as well as scientific, ethical and legal standards
- Academic integrity and freedom
- Intercultural dialogue

The document, which does not have a specific regional focus, was supplemented by the "Guiding Questions on University Cooperation with the People's Republic of China", which go into more detail on how to implement the proposed guidelines specifically in the cooperation with China.

[Guiding Questions on University Cooperation with the People's Republic of China \(2020\)](#)

Target audience:	German higher education institutions
Regional focus:	China-specific
Thematic focus:	strategy and governance; academic integrity; knowledge security; quality in cooperation; intercultural aspects
Structure:	objectives, guidelines/guiding questions, further reading
Level of guidance:	detailed, practical guidance
Language:	English (German version)
Page total:	18 pages
Most relevant:	p. 6-17

HRK developed a total of 59 guiding questions that address specific concerns in the cooperation with Chinese partners together with a number of experts on China. Although the majority of German-Chinese research collaboration is considered to be mutually beneficial in most cases, and even essential in some fields, CCP influence on the curricula and bureaucratic processes at Chinese universities as well as negative impacts on academic freedom have become a growing concern in recent years. However, rather than cutting ties with China, the HRK proposes to strengthen dialogue and cooperation while being mindful of one's own values as well as the potential challenges involved.

In this context, the guiding questions are intended to map out both necessary and optional courses of action in the establishment and further development of partnerships with China.

The guiding questions include suggestions such as:

- Clearly define responsibilities within the university as well as within partnerships
- Develop and implement control mechanisms and review procedures
- Make funding decisions and concepts transparent, avoid one-sided or long-term dependencies
- Write exit clauses into contracts
- Establish a contact point or person for advice regarding cooperation with China, as well as a person who Chinese students and scholars can approach with questions
- Implement clear reporting mechanisms for incidents relating to foreign interference etc.
- Ascertain whether the objectives of the participating institutions are compatible
- Invest in and make use of expertise on China, individual actors on the Chinese side, and risk-prone areas of research
- Ensure that all partners observe research, ethical, and legal standards

Global Public Policy Institute (GPPi)

Authors: Asena Baykal, Thorsten Benner

[Risky Business: Rethinking Research Cooperation with Non-Democracies. Strategies for Foundations, Universities, Civil Society Organizations, and Think Tanks \(2020\)](#)

Target audience:	foundations, universities, research organizations, civil society organizations, think tanks in democratic countries
Regional focus:	non-democracies (China, Russia, Turkey)
Thematic focus:	agenda-setting; academic integrity; knowledge security; intelligence-sharing
Structure:	information on democratic values and red lines; information regarding potential risks of cooperation with non-democracies; strategies to counteract risk; guidelines
Level of guidance:	very detailed, practical guidance
Language:	English
Page total:	58 pages
Most relevant:	p. 35-52

The Global Public Policy Institute (GPPi) is an independent non-profit think tank that published this study to support actors in democratic countries in the process of rethinking scientific cooperation with non-democracies and provide strategies that can aid risk management.

The document states that neither cutting all ties with non-democratic partners nor conducting business as before should be the way forward; rather, the GPPi urges universities and research organizations in democratic countries to reaffirm and clearly state their values and red lines while being aware of the potential challenges and risks before engaging in research cooperation or exchange with non-democracies such as China.

Among 74 guidelines in total, the GPPi suggests to:

- Invest in and make use of country-specific expertise
- Offer preparatory and follow-up seminars for participants in international cooperation projects
- Conduct background checks on potential partners and organizations
- Foster topic-specific expertise, especially on dual use technology, to better assess risk
- Develop a categorization system of risk-prone areas of research
- Make use of tools such as the Academic Freedom Index, the Australian Strategic Policy Institute's China Defence Universities Tracker, and the German BAFA's list of sensitive research areas
- Implement access restrictions where dual use or other sensitive technologies are concerned
- Maintain incident trackers and share these among organizations in democratic countries
- Include exit strategies in cooperation agreements

Industrial espionage and spying on competitors in Germany and Europe (WISKOS)

[Risks for the German research location - Guidelines for dealing with scientific espionage and spying on competitors in the scientific context](#)

(German original title: Risiken für den deutschen Forschungsstandort - Leitfaden zum Umgang mit Wissenschaftsspionage und Konkurrenzausspähung im Wissenschaftskontext)

Target audience:	German universities and research institutions
Regional focus:	no specific focus
Thematic focus:	scientific espionage
Structure:	information on espionage activities; recommendations; additional resources
Level of guidance:	somewhat detailed
Language:	German
Page total:	28 pages
Most relevant:	p. 19-23

WISKOS is a project funded by the Federal Ministry of Education and Research (BMBF) that focused on a threat analysis of economic and scientific espionage.

WISKOS suggests that higher education institutions should

- Perform a risk analysis of different research areas to determine their individual risk profile and adjust policies and processes accordingly
- Train staff and researchers according to their individual risk
- Appoint a member of staff as security officer or consider involving external security advisors
- Exercise greater oversight over visiting scholars
- Track researchers' career paths after they leave the institution
- Make use of confidentiality agreements
- Enforce both physical and digital access controls where necessary
- Ensure compliance with security protocols, especially where sensitive data is concerned
- Contact the police or the state or federal criminal investigation offices when suspicions of espionage arise

Working Group China Research

(AG China-Forschung)

[Pathways to Research with China - Knowledge, Approaches, Recommendations \(2020\)](#)

(German original title: Wege in die Forschung mit China – Wissen, Zugänge, Empfehlungen)

Target audience:	German universities and research institutions
Regional focus:	China-specific
Thematic focus:	existing successful cooperation with China; background information
Structure:	information about the Chinese higher education system and relevant preconditions; information about Chinese economic interests; potential steps towards building cooperation agreements; best practice examples
Level of guidance:	detailed background information on Chinese context
Language:	German
Page total:	78 pages
Most relevant:	p. 7-9, 48-74

The Working Group China Research was appointed by Lower Saxony's Ministry for Science and Culture. The white paper advocates for a knowledge-based approach to cooperation with China. To that effect, it offers detailed background information on the Chinese higher education sector as well as economic areas of interest, and presents a number of examples to illustrate how and on which topics joint research between Germany and China has been conducted. It gives an overview of different projects and the partners involved and makes recommendations based on the respective experiences. Two examples of preparatory activities for research cooperation projects are also included. Each example had its own characteristics, but within the included case studies, the following overarching observations about prerequisites and conditions for the successful research cooperation with China were made:

- Mutual trust is key for joint projects as well as for being able to conduct on-site research
- Balanced funding increases efficiency and effectiveness of projects
- An on-site presence is recommended for continuous implementation of projects
- Symposia and joint publications are important activities for both sides
- Involvement of young scientists enhances positive effects
- Long term strategic research partnerships often include other aspects such as teaching and industry cooperation

The White Paper offers the following recommendations:

- Establish relevant advisory bodies at the federal level
- Develop matching processes to support the establishment of contacts and collaborations
- Develop a monitoring system to support the systematic setup of research cooperation projects and STI cooperation strategies based on China expertise

Japan

Director General for Science, Technology and Innovation

Guidelines for Collaboration of Universities and National Research and Development Agencies with Foreign Companies (2019)

(Japanese original title: 大学・国立研究開発法人の外国企業との連携に係るガイドライン)

Target audience:	Japanese universities and National Research and Development Agencies
Regional focus:	no specific focus
Thematic focus:	objectives; risk management; technology transfer; export control
Structure:	information on relevant laws/regulations; examples of existing initiatives; recommendations
Level of guidance:	general; partly practical
Language:	Japanese
Page total:	32 pages
Most relevant:	p. 1; p. 5- 22; p. 23-31

The guidelines were put together by the Japanese government to address collaboration between Japanese universities and research institutes with foreign companies. The document delivers information on relevant laws, risk management, and administrative considerations, clarifies appropriate approaches to collaboration, and assesses benefits of collaboration. It concludes that to lead in global competition, Japanese universities and research institutions have to intensify their collaboration with foreign companies.

The following measures should be taken to create mutually beneficial relationships and prevent unintended technology transfer or reputational risk: high-level risk management system, compliance with laws and regulations (e.g. Security Export Control, Unfair Competition Prevention Act, Japanese Bayh-Dole Act), systematic mechanisms and organizational structure for process management and development, monitoring, follow-up.

The guidelines include specific examples of initiatives taken by Japanese and foreign (German, American, French, British) universities and public research institutions.

Netherlands

[The Hague Centre for Strategic Studies \(HCSS\)](#)

Authors: Frank Bekkers, Willem Oosterveld, Paul Verhagen

[Checklist for Collaboration with Chinese Universities and Other Research Institutions \(2019\)](#)

Target audience:	Dutch universities and research institutions
Regional focus:	China-specific
Thematic focus:	academic freedom; knowledge transfer; agenda-setting
Structure:	guiding questions
Level of guidance:	general guidance
Language:	English
Page total:	18 pages
Most relevant:	p. 3-15

The Hague Centre for Strategic Studies (HCSS) is an independent think tank that published these guidelines with the aim of ensuring academic freedom as well as mutually beneficial partnerships, and counteracting against the inadvertent transfer of science and technology to China. Previously, HCSS and the Leiden Asia Centre (LAC) worked on a mapping of risks and challenges of the collaboration with China. HCSS hopes to enhance the benefits of research cooperation for the Netherlands rather than discourage cooperation entirely.

Among the outcomes of the HCSS/LAC joint study is a list of 10 guiding questions that were designed to provide support to universities and research institutions by helping them to assess the challenges and risks involved in collaboration with China. Some of the suggestions are as follows:

- Determine the objectives of the research project and how the collaboration with a Chinese partner will help to achieve them
- Determine how the project will be funded and how this affects partners on both sides
- Ensure a balanced partnership that allows access to research results for all those involved
- Ensure that all those involved are aware of potential challenges and risks
- Consider potential restrictions on academic freedom
- Ensure appropriate data management policies

Leiden Asia Centre (LAC)

Authors: Dr. Ingrid d'Hooghe, Jonas Lammertink

Towards Sustainable Europe-China Collaboration in Higher Education in Research (2020)

Target audience:	European higher education and research institutions
Regional focus:	China-specific
Thematic focus:	sustainable, mutually beneficial cooperation
Structure:	information on current research climate in China; information on the current state of European-Chinese collaboration; analysis of 5 existing guideline documents; list of 17 recommendations
Level of guidance:	general guidance
Language:	English
Page total:	82 pages
Most relevant:	p. 55-57

The Leiden Asia Centre (LAC) is an independent research center for knowledge on modern East Asia. "Towards Sustainable Europe-China Collaboration in Higher Education and Research" aims to provide a framework to aid European universities and research institutions in the establishment and further development of beneficial and sustainable research collaboration with Chinese partners. Collaboration with China is considered to have become essential for research and innovation in Europe, but some of the challenges and risks need to be met with better coordination on the European side, as well as strong measures that safeguard academic integrity and freedom, keep knowledge secure, and ensure mutually beneficial cooperation on the basis of reciprocity.

Some of the suggestions LAC offers are as follows:

- Invest in expertise on China, especially in knowledge about Chinese higher education institutions, their political ties, developments in higher education in China, and developments in science and technology
- Develop and implement safeguards for academic integrity, academic freedom, and knowledge security
- Establish a joint coordinating entity at the national level to facilitate a cooperative approach to the challenges and risks involved in collaboration with Chinese partners
- Develop appropriate guidelines that are proportionate to the specific risk and tailored to scholars in specific research fields
- Engage and share knowledge with other EU member states

Sweden

[The Swedish Foundation for International Cooperation in Research and Higher Education \(STINT\)](#)

[Responsible Internationalisation: Guidelines for reflection on international academic collaboration \(2020\)](#)

Target audience:	Swedish universities and research institutions
Regional focus:	no specific focus
Thematic focus:	political, social, cultural and legal context of the partner country; motivation for collaborating; strategic design of collaborations
Design:	information highlighting benefits and risks; guiding questions
Level of guidance:	general guidance
Language:	English
Page total:	12 pages
Most relevant:	p. 6-10

The Swedish Foundation for International Cooperation in Research and Higher Education (STINT) was set up by the Swedish government. These guidelines, which were developed in cooperation with several Swedish universities, are intended to aid members of Swedish higher education institutions in assessing and approaching international collaboration. STINT views internationalization of research as generally positive, as it generates value and aims to enhance research quality.

Among a total of 30 guiding questions, STINT suggests to:

- Clearly define the objectives, forms and outcomes of the collaboration
- Ensure that funding is transparent and balanced
- Assess whether the type of funding poses risks regarding academic integrity and freedom
- Offer support to help all those involved understand the political, social, and cultural context of the partner country
- Closely assess risks for dual use of research results
- Research intellectual property rights and data protection regulations in the partner country
- Consider ethical aspects and the potential for infringements on academic freedom

United Kingdom

Academic Freedom and Internationalisation Working Group (AFIWG)

DRAFT MODEL CODE OF CONDUCT: Protection of Academic Freedom and the Academic Community in the context of the internationalisation of the UK HE Sector (2020)

Target audience:	UK higher education institutions
Regional focus:	no specific focus
Thematic focus:	academic freedom
Structure:	information on benefits and risks of internationalization; list of responsibilities
Level of guidance:	general guidance
Language:	English
Page total:	7 pages
Most relevant:	p. 3-6

The Academic Freedom and Internationalisation Working Group (AFIWG) is an initiative to strengthen academic freedom in the context of increasing internationalization. AFIWG regards the internationalization of the academic sector as overwhelmingly positive, but intends to raise awareness to the challenges and risks involved, including those associated with violations of academic freedom.

To protect against threats to academic freedom, AFIWG calls for increased transparency and accountability across the higher education sector. Among a total of 28 recommendations, AFIWG suggests to:

- Implement thorough risk assessments and due diligence of both potential research collaboration partners as well as topics before entering into cooperation agreements
- Reference publicly available data such as the Academic Freedom Index
- Agree on, implement, monitor and regularly reevaluate/adapt measures to safeguard academic freedom
- Develop confidential reporting mechanisms for incidents relating to threats to academic freedom
- Support members of higher education student whose academic freedom is at risk
- Incorporate measures to protect academic freedom into Memoranda of Understanding (MOUs)

Centre for the Protection of National Infrastructure (CPNI)

Trusted Research Guidance for Academia

Target audience:	UK higher education institutions, particularly researchers in STEM fields
Regional focus:	no specific focus
Thematic focus:	research security; intellectual property and data protection; compliance with legal frameworks
Structure:	information on potential risks of international collaboration; recommendations
Level of guidance:	somewhat detailed
Language:	English
Page total:	21 pages
Most relevant:	p. 3-20

The Centre for the Protection of National Infrastructure (CPNI) provides security advice to businesses and organizations across the UK. The Trusted Research Guidance was developed to ensure and maintain mutually beneficial international cooperation while protecting intellectual property and sensitive research.

CPNI suggests to:

- Ensure that due diligence processes include ethical, financial, legal and national security considerations to inform decision-making
- Ensure maximum transparency to avoid conflicts of interest
- Enforce access controls where necessary in order to protect intellectual property and data
- Implement effective cyber security mechanisms
- Perform background checks on potential partners and affiliated institutions
- Ensure compliance with export control and technology transfer regulations
- Consider end uses and the potential for patenting throughout the research cycle
- Exercise oversight over visiting scholars and visitors to campus
- Ensure that intellectual property and research data is protected while traveling overseas
- Take steps to protect IT devices from phishing attacks etc.

Universities UK (UUK)

Managing Risks in Internationalisation: Security Related Issues (2020)

Target audience:	UK higher education institutions
Regional focus:	no specific focus
Thematic focus:	academic integrity; knowledge security; protecting values, reputation, people, campuses, research, and transnational education; establishing reporting infrastructures; individual responsibility
Structure:	guidelines underpinned by several case studies and scenarios; links to additional resources; guiding questions
Level of guidance:	very detailed and practical guidance
Language:	English
Page total:	61 pages
Most relevant:	p. 14-47, p. 55-57

Universities UK (UUK) is special interest group for universities in the United Kingdom. These guidelines were published with the intention of enabling universities to protect themselves, their staff and students as well as managing specific risks associated with internationalization while actively pursuing international cooperation and dialogue. UUK provides several case studies and suggests a number of additional resources.

Most importantly, UUK suggests that universities and research institutions should:

- Identify their institution's individual risk profile, regularly review as risks change over time, and develop/adapt policies and processes accordingly
- Provide annual risk reports to governing bodies
- Encourage staff to raise concerns about partnerships
- Establish clear codes of conduct, policies, and legal agreements along with relevant training, especially where sensitive areas of research are concerned
- Develop a reporting infrastructure through which both staff and students can report any concerns and receive support, regularly update this infrastructure as threats evolve over time
- Develop and implement cybersecurity strategies and contractual agreements to protect intellectual property
- Comply with export control legislation
- Include appropriate exit strategies along with a mutual understanding of what could trigger an exit with any cooperation agreement

USA

[Association of American Universities \(AAU\); Association of Public and Land-grant Universities \(APLU\)](#)

[University Actions to Address Concerns about Security Threats and Undue Foreign Government Influence on Campus \(2020\)](#)

Target audience:	US universities
Regional focus:	no specific focus
Thematic focus:	risk assessments; export controls; cybersecurity; intellectual property; technology control; travel safeguards; academic freedom
Structure:	recommendations; example measures
Level of guidance:	general
Language:	English
Page total:	7 pages
Most relevant:	p. 1-7

According to the findings of a 2019 survey of American universities by the AAU and the APLU, the document presents a summary of methods that some universities have already implemented to address risks related to foreign interference. Universities are encouraged to implement similar measures to ensure the security of their research and protect academic integrity on their own campuses.

AAU and APLU recommend to:

- Build awareness, especially about export control regulations and other disclosure requirements
- Provide relevant training to staff and students
- Strengthen cyber security and data protection measures
- Continuously update conflict of interest and conflict of commitment policies
- Develop international travel policies including security briefings, review of travel plans, and ensure that electronic equipment is protected from potential cyber security threats before, after, and during international travel
- Exercise oversight over visitors to campus
- Strengthen existing policies and employ staff with relevant experience to ensure compliance with export control regulations
- Form task forces that can coordinate risk assessments
- Assign clear responsibilities and points of contact

Human Rights Watch (HRW)

Resisting Chinese Government Efforts to Undermine Academic Freedom Abroad. A Code of Conduct for Colleges, Universities, and Academic Institutions Worldwide (2019)

Target audience:	higher education institutions worldwide
Regional focus:	China-specific
Thematic focus:	academic freedom
Structure:	code of conduct with 12 recommendations
Level of guidance:	partly specific recommendations
Language:	English
Page total:	3 pages
Most relevant:	p. 1-3

Human Rights Watch (HRW) is an international human rights-focused NGO. HRW created this code of conduct based on more than 100 interviews that were conducted between 2015 and 2018 in Australia, Canada, France, Great Britain and the United States with academics, graduate and undergraduate students and administrators from a range of different institutions. It is designed to support higher education institutions in ensuring their academic integrity and protecting the academic freedom of their students, particularly those who work on or are from China.

Some of the proposed recommendations to worldwide institutions of higher education are as follows:

- Recognize threats to academic freedom and academic integrity
- Strengthen commitment to and policies for academic freedom on campus
- Develop and implement reporting mechanisms and incident trackers
- Offer support and flexibility to students and scholars whose progress or careers are under threat due to Chinese curtailment of academic freedom
- Monitor activities of all organizations on campus that receive Chinese funding
- Publicly disclose sources of Chinese funding as well as projects and collaborations with Chinese counterparts

National Science and Technology Council

Recommended Practices for Strengthening the Security and Integrity of America's Science and Technology Research Enterprise (2021)

Target audience:	US higher education institutions
Regional focus:	no specific focus
Thematic focus:	research security
Structure:	information on benefits and risks of international cooperation; recommended practices
Level of guidance:	detailed
Language:	English
Page total:	22 pages
Most relevant:	p. 6-15

The National Science and Technology Council (NSTC) was established to coordinate the US government's science and technology policies. The document emphasizes the benefits of an open research environment, but stresses that this openness must be supported by appropriate safeguards. These guidelines were developed to aid higher education institutions in protecting their academic integrity and the security of their research.

Among a total of 21 recommendations, NSTC suggests to:

- Include all members of a given institution in the establishment of an organizational approach to research security
- Assess the institution's specific risk profile and develop policies and processes accordingly
- Centralize review and approval processes for international research cooperation
- Develop strict conflict of interest, conflict of commitment and disclosure policies
- Consider digital persistent identifier policies
- Develop appropriate training and guidance for staff, scholars and students
- Ensure compliance with all relevant policies and regulations
- Establish policies for securely hosting visiting scholars and other foreign visitors to campus
- Develop and maintain data security protections

University of Rochester

International Research & Global Collaboration (2019)

Target audience:	University of Rochester community
Regional focus:	no specific focus
Thematic focus:	disclosure policies; hosting visitors; travel; publications
Structure:	overview over relevant policies; guidelines
Level of guidance:	general
Language:	English
Page total:	13 pages
Most relevant:	p. 5-12

The University of Rochester published these guidelines to ensure mutually beneficial cooperation with international partners and compliance with relevant policies and regulations in an environment that increasingly raises concerns about the risks and challenges involved in international academic collaboration.

The university recommends to:

- Disclose all types of collaborative activities that involve foreign entities; all types of foreign or domestic funding, grants, and gifts; and participation in foreign talent programs
- Exercise greater oversight over visiting scholars and short-term visitors
- Ensure data and intellectual property protection, particularly where sensitive research is concerned
- Ensure that publications are affiliated with the university
- Register travel abroad with the university. Avoid bringing sensitive data to the destination, consider using a sanitized laptop

Analysis of current and publicly available documents on securing international science cooperation

Part II: Meta-Guidelines supporting the safe and successful international science and technology cooperation

EU Research and Innovation Knowledge Network on China

Preface

In the past years, various guidelines have been published with the aim of improving international research and innovation cooperation. These guidelines have been produced by very different groups and individuals, address different target groups, focus on different topics, and some have specific political intentions. Some of these guidelines give rather general advice, others are very detailed. Some of them are state agnostic, others address the cooperation with specific countries. They are addressed to individuals but sometimes also to institutions or policy makers; most are addressed specifically to members of higher education institutions or individual researchers.

It is not easy for the European user from a university or research organization to find and classify the appropriate recommendations. To facilitate this, an analysis of recently published and publicly accessible documents has been carried out. The results of the analysis are presented in 2 parts:

Part I: Annotated collection of checklists and guidelines for the international science and technology cooperation

Part II: Meta-Guidelines supporting the safe and successful international science and technology cooperation

1 Part II: Meta-Guidelines supporting the safe and successful international science and technology cooperation

These meta guidelines are intended to support universities and research institutions in setting up international collaborations as well as in managing the specific risks that have been identified in the scientific cooperation and other types of academic exchange with non-democracies.

As a result of the collection of guidelines in part I, this document compiles guidelines and guiding questions from the following documents, which each cover different aspects that are relevant for the cooperation with specific countries or non-democracies in general:

- [Checklist for collaboration with Chinese Universities and Other Research Institutions](#) (The Hague Centre for Strategic Studies, 2019. Authors: Frank Bekkers, Willem Oosterveld, Paul Verhagen)
- [EU compliance guidance for research involving dual-use items](#) (EU Commission, 2020)
- [Guidelines to counter foreign interference in the Australian university sector](#) (University Foreign Interference Task Force, 2019)
- [Guiding questions on university cooperation with the People's Republic of China](#) (German Rectors' Conference, 2020)
- [Hunting the phoenix – The Chinese Communist Party's global search for technology and talent](#) (Australian Strategic Policy Institute, 2020. Author: Alex Joske)
- [Managing Risks in Internationalisation: Security Related Issues](#) (Universities UK, 2020)
- [Picking flowers, making honey – The Chinese military's collaboration with foreign universities](#) (Australian Strategic Policy Institute, 2018. Author: Alex Joske)
- [Resisting Chinese government efforts to undermine academic freedom abroad](#) (Human Rights Watch, 2019)
- [Risky Business: Rethinking Research Cooperation and Exchange with Non-Democracies](#) (Global Public Policy Institute, 2020. Authors: Asena Baykal, Thorsten Benner)

The documents were chosen for their level of detail in covering aspects or partial aspects that have to be considered by stakeholders of the European science and technology landscape when building and maintaining cooperation projects or undergoing other types of exchange with partners from non-democracies.

By pooling the information provided in these documents and thus combining expertise from several different countries and institutions, these meta-guidelines hope to cover all relevant aspects for safe and mutually beneficial cooperation.

The categorization of the options for action or recommendations for action of the guidelines used is not based on a structured, scientifically backed standard, but is the result of the evaluation of the editors through the step-by-step compilation of the recommendations for action. Of course, other forms of compilation and grouping are also possible.

The analysis makes no claim to completeness but is instead intended to make the access to guidelines and checklists easier for users.

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1. Due diligence on new and existing international cooperation

- “What minimum level of due diligence is applied to foreign investments and partnerships?”¹
- “Investments in due diligence should put organizations in a position to make informed decisions about the entities from non-democracies with which they want to – or do not want to – associate themselves. At the same time, identifying low-risk cooperation areas upfront allows organizations to approach every new cooperation project with only the degree of caution that is warranted.”²
- “Due diligence to mitigate security-related risks should be undertaken regularly, with regular reviews in relation to international partnerships and projects, including research partnerships, as well as sources of income, such as investments, donations, philanthropy, commercialisation, capital investment, tuition fee income and staff honorary and consultancy appointments. Full consideration should be given to the potential for security breaches in every engagement, from the most informal collaboration to the most formal partnership.”³
- “What level of internal reporting applies to foreign investments and partnerships and how does this aid accountability and risk management?”⁴
- “Does the university have internal guidelines that provide a framework for the cooperation with China? Was or is there an internal discussion at the university that involves all relevant actors and achieves an institutional consensus on the key issues for the university?”⁵
- “Ensure that due diligence processes consider reputational, ethical and security risks.”⁶
- “Does the university have review procedures for the handling of problematic incidents? How is it decided which grounds militate for or against continuation of the cooperation if no agreement can conceivably be reached with Chinese partners? Who should be involved in this decision? What steps are taken to deal with recurring problems? Have potential exit strategies been defined for the cooperation?”⁷
- “Has it been ensured that the research cooperation is compliant with the principles of the university and that research data will not be collected under ethically problematic conditions? Has an internal ethics committee been established at the university that addresses ethical issues in the context of the projects in question where needed?”⁸
- “Institutions should consider the implications of laws with extraterritorial application for their students, staff and visitors. In response legislation with extraterritorial implications, some academic institutions have introduced protections for students. This has included, for example, identifying without modifying course material to students that might be considered politically sensitive in certain states. Institutions could also take steps to protect students by introducing the Chatham House rule to seminars or other oral discussions, and otherwise introducing measures that allow students to submit coursework anonymously.”⁹
- “Ensure that there’s sufficient resourcing to implement and ensure compliance with policies on conflicts of interest, commercialisation, integrity and intellectual property.”¹⁰

¹ Guidelines to counter foreign interference in the Australian university sector, p. 12.

² Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 37.

³ Managing risks in internationalisation: security related issues, p. 20.

⁴ Guidelines to counter foreign interference in the Australian university sector, p. 12.

⁵ Guiding questions on university cooperation with the People’s Republic of China, p. 9.

⁶ Managing risks in internationalisation: security related issues, p. 20.

⁷ Guiding questions on university cooperation with the People’s Republic of China, p. 7.

⁸ Guiding questions on university cooperation with the People’s Republic of China, p. 14.

⁹ Managing risks in internationalisation: security related issues, p. 25.

¹⁰ Hunting the phoenix. The Chinese Communist Party’s global search for technology and talent, p. 28.

- “Fully investigate cases of fraud, misconduct or nondisclosure. These investigations should determine why existing systems failed to prevent misconduct and then discuss the findings with relevant government agencies.”¹¹
- “How do staff understand what risks should be shared with government agencies?”¹²
- “How do staff know who their university contact is for liaison with government agencies?”¹³
- “Is there an internal monitoring system at the university for recurring questions and problems? What steps are taken to deal with recurring problems?”¹⁴
- “What level of visibility do senior administrators and officials in universities have of staff appointments?”¹⁵
- “What level of oversight exists for staff appointments, including secondary appointments (e.g. honorary and adjunct roles)?”¹⁶
- “How could research integrity offices and security offices in universities assist researchers in due diligence activities?”¹⁷

1.1 Agenda-setting

- “What is the partnership’s aim? It is wise to formulate your own goals for the partnership and then consider whether they can be achieved in practice. Which factors determine success or failure? Is there a risk that certain activities could be blocked by the Chinese partner for political or strategic reasons, or might have to be designed differently? Are your aims and objectives in line with national or regional policy guidelines? Is there a reasonable chance that the envisaged aims will still be intact at the end of the project? Are the aims on the Chinese side known and understood and can they be reconciled with your own?”¹⁸
- “What form will the partnership take? What parties are directly or indirectly involved in the partnership? Will any third parties be joining at a later stage who could demand a particular role or a stake? What contribution could they make to the factors that determine success or failure in achieving the objectives? What are the options for monitoring this?”¹⁹
- “Why work with a partner from China rather than another country? In view of the potentially serious limitations and risks that collaboration with Chinese parties can involve, it is useful to examine whether the desired results can be more easily achieved elsewhere. There are substantive considerations: is the integrity of the shared data at stake and can researchers operate freely? There are also possible procedural issues: is it easy to get visas? Is screening required? Are financial transactions guaranteed? Such considerations may lead to the conclusion that collaboration with European partners will ultimately prove more worthwhile.”²⁰
- “Be selective when choosing cooperation projects.”²¹
- “What institutional return or added value will be created for the university? Has an appropriate balance been struck between expenditure and return?”²²

¹¹ Hunting the phoenix. The Chinese Communist Party’s global search for technology and talent, p. 28.

¹² Guidelines to counter foreign interference in the Australian university sector, p. 23.

¹³ Guidelines to counter foreign interference in the Australian university sector, p. 23.

¹⁴ Guiding questions on university cooperation with the People’s Republic of China, p. 10.

¹⁵ Guidelines to counter foreign interference in the Australian university sector, p. 11.

¹⁶ Guidelines to counter foreign interference in the Australian university sector, p. 12.

¹⁷ Guidelines to counter foreign interference in the Australian university sector, p. 18.

¹⁸ Checklist for Collaboration with Chinese Universities and Other Research Institutions, p. 4.

¹⁹ Checklist for Collaboration with Chinese Universities and Other Research Institutions, p. 5.

²⁰ Checklist for Collaboration with Chinese Universities and Other Research Institutions, p. 3.

²¹ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 43.

²² Guiding questions on university cooperation with the People’s Republic of China, p. 6.

- “Was an agreement reached on the objectives of the partnership at the start of the cooperation? Are the objectives of the participating institutions compatible?”²³
- “Abandon the idea and practice of “dialogue for dialogue’s sake.” Organizations should ask themselves whether attending a dialogue event or participating in a cooperation project will add any concrete value for them. The benefits of networking should be weighed against the risks of being instrumentalized for authoritarian PR.”²⁴
- “How does the partnership fit into the university’s long-term strategic planning? Can any conflicting objectives be identified in view of other cooperation projects or general objectives of the university?”²⁵
- “Are there commercial interests at stake? Commercial interests may be at stake, especially in partnerships in areas of research with major technological added value. From the Chinese viewpoint, these interests are never hard to find. This makes it important to identify the commercial risks beforehand, not only in joint projects but also in working with third parties.”²⁶
- “What mechanisms does your university have to identify and protect commercially valuable research?”²⁷
- “Do researchers consider the potential for their research to be used for purposes that are inconsistent with promoting economic, social and security benefits (...)?”²⁸
- “Have the interests of economic actors participating in the cooperation been documented transparently? Has it been ensured that these interests do not obstruct the actual research interests (e. g. prohibition of publication)?”²⁹
- “Is the teaching or research cooperation expected to result in scientific or economic added value for the participating (...) actors? What other types of added value are hoped for?”³⁰
- “What elements of the activity need to be scoped differently as a result of the partnership and if so, do the benefits outweigh the risks?”³¹
- “How does the partnership consider potential internal and external risks to the university where it may be appropriate to obtain executive advice and approval?”³²
- “Researchers should consider the intentional and unintentional potential consequences if foreign interference occurs. Key questions include: Who might be affected by this research – positive and negative consequences? How might they be affected? What might be affected by this research – positive and negative consequences? University guidelines and advice could adapt existing security and personal safety protections as required.”³³

1.2 Contracts and legal frameworks

- “Formulate clear rules (such as codes of conducts) for properly approaching interactions with entities from non-democracies before entering into any type of cooperation contract.”³⁴

²³ Guiding questions on university cooperation with the People’s Republic of China, p. 6.

²⁴ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 43.

²⁵ Guiding questions on university cooperation with the People’s Republic of China, p. 6.

²⁶ Checklist for Collaboration with Chinese Universities and Other Research Institutions, p. 13.

²⁷ Guidelines to counter foreign interference in the Australian university sector, p. 19.

²⁸ Guidelines to counter foreign interference in the Australian university sector, p. 19.

²⁹ Guiding questions on university cooperation with the People’s Republic of China, p. 14.

³⁰ Guiding questions on university cooperation with the People’s Republic of China, p. 11.

³¹ Guidelines to counter foreign interference in the Australian university sector, p. 15.

³² Guidelines to counter foreign interference in the Australian university sector, p. 15.

³³ Guidelines to counter foreign interference in the Australian university sector, p. 21.

³⁴ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 41.

- "Specific legal advice should be sought in relation to contract design and ensuring the appropriate protections are in place."³⁵
- "Do not allow for foreign jurisdiction over any partnership contracts that govern activities in liberal democracies."³⁶
- "How are contracts drafted to give the university clear authority to withdraw from the agreement should the partnership impinge on academic freedom and research ethics or be found to be subject to export controls?"³⁷
- "Make sure to always have the legal option and be ready to terminate a contract if necessary."³⁸
- "The (...) institution should have in place an appropriate exit strategy with provisions in place, along with an understanding of what would trigger an exit. Ultimately, this could include the right to withdraw from the agreement or terminate it early without incurring any liabilities if the ongoing due diligence exercise reveals that the overseas organization or researcher is no longer an appropriate partner. An example would be where the ongoing due diligence exercise reveals that the university's legal obligation to maintain academic freedom is under threat."³⁹
- "For all formal interactions with partner organisations or individuals, use best practice contracting mechanisms and policies to manage security-related risks. Terms and conditions of agreements or memoranda of understanding should include clauses that protect the integrity of academic activity."⁴⁰
- "Can all partners access and use the findings of the joint research? Research findings may represent different stakes for the various parties involved. It is therefore vital to know what can be done with the findings in terms of publication or sharing with third parties, so that none of the partners can unexpectedly veto a decision."⁴¹
- "Has access to the cooperation activities been adequately guaranteed for academically relevant partners (or partner institutions)? What measures will the university take if it becomes apparent that individual persons or institutions have been excluded on the basis of their background, political orientation, religion, gender or geographical location?"⁴²
- "Has a legal framework been agreed in writing that guarantees that the research cooperation and its results benefit both sides (e. g. access to and use of research data with a transfer plan for cross-border data communication)?"⁴³
- "How is it decided which grounds militate for or against continuation of the cooperation if access to jointly generated research data is expected to be restricted? Who should be involved in this decision?"⁴⁴
- "Has a coordinated approach been agreed upon with regard to the application of internationally accepted procedures in publication practice?"⁴⁵
- "Are the legal bases of the joint use of research infrastructures and research data clear in both [the EU country] and China and have aspects been addressed that could prove to be problematic?"⁴⁶
- "Have you taken steps to ensure that any translated versions of contractual agreements include identical terms and conditions?"⁴⁷

³⁵ Managing risks in internationalisation: security related issues, p. 20.

³⁶ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 42.

³⁷ Guidelines to counter foreign interference in the Australian university sector, p. 17.

³⁸ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 42.

³⁹ Managing risks in internationalisation: security related issues, p. 20.

⁴⁰ Managing risks in internationalisation: security related issues, p. 20.

⁴¹ Checklist for Collaboration with Chinese Universities and Other Research Institutions, p. 7.

⁴² Guiding questions on university cooperation with the People's Republic of China, p. 7.

⁴³ Guiding questions on university cooperation with the People's Republic of China, p. 12.

⁴⁴ Guiding questions on university cooperation with the People's Republic of China, p. 12.

⁴⁵ Guiding questions on university cooperation with the People's Republic of China, p. 12.

⁴⁶ Guiding questions on university cooperation with the People's Republic of China, p. 12.

⁴⁷ Managing risks in internationalisation: security related issues, p. 56.

- “Check whether the proposed contractual conditions align with the organization’s overarching values. To make this process easier and guide potential internal discussions on the proposed conditions for cooperation, it can be helpful to have a standardized, comprehensive set of questions to ask when reviewing a contract. These should be rooted in an organization’s core values.”⁴⁸
- “Protect core values and wider interests by integrating control and sanctions mechanisms in contracts with cooperation partners from nondemocracies.”⁴⁹
- “As (...) universities increase their operations overseas, they may find that the legal and social frameworks of other countries do not necessarily match (...) in respect of, for example, to anti-discrimination policies and the protection of individual rights. These should be assessed within the normal risk management framework.”⁵⁰
- “While recognizing that (...) norms of academic freedom and freedom of speech may not be legally upheld in other countries, universities can still take measures to ensure that core values such as equality and diversity are respected within the university’s own scope and working environment. For example, a university might publish a charter of values for staff working internationally, clearly stating the implications of the university’s commitment to values of equality, diversity and respect, while recognizing the laws and cultural norms of the country.”⁵¹

1.3 Funding

- “Are the funding concept and agreements governing the cooperation transparent and comprehensible for all participants?”⁵²
- “Who will fund the partnership, and how will this affect the partners’ rights, obligations and responsibilities? It is important to know who will fund the project – directly or indirectly. This is particularly true when working with a country like China, where the government plays a major role not only as the financier but also in directly or (more often) indirectly shaping the partnership’s content and form. Between the lines of the formulated and agreed objectives, there may also be other, implicit objectives. An agreement that leaves room for interpretation can cause friction at a later stage.”⁵³
- “Partner organisations or individuals may seek to access or influence particular areas of activity through various forms of funding arrangements and other inducements targeted at individuals. To mitigate this, individuals and institutions should be transparent about their sources of funding. Due diligence should establish which processes exist to manage security-related risks when considering sources of potential income.”⁵⁴
- “Is the funding concept balanced and does it involve all partners to an appropriate degree? Have the medium- and long-term financial implications of the cooperation been considered? Will long-term financial dependencies be avoided?”⁵⁵
- “Define and enforce consequences for cooperation partners from nondemocracies that withhold information about government or military ties or funding.”⁵⁶
- “Can it be determined whether individual university members benefit (financially or otherwise) from the cooperation?”⁵⁷

⁴⁸ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 41.

⁴⁹ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 42.

⁵⁰ Managing risks in internationalisation: security related issues, p. 25.

⁵¹ Managing risks in internationalisation: security related issues, p. 25.

⁵² Guiding questions on university cooperation with the People’s Republic of China, p. 8.

⁵³ Checklist for Collaboration with Chinese Universities and Other Research Institutions, p. 6.

⁵⁴ Managing risks in internationalisation: security related issues, p. 20.

⁵⁵ Guiding questions on university cooperation with the People’s Republic of China, p. 8.

⁵⁶ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 43.

⁵⁷ Guiding questions on university cooperation with the People’s Republic of China, p. 9.

- “Is there a consensus within the university as to which types of Chinese funding are compatible with its principles as an institution and which framework conditions the funding should be based on?”⁵⁸
- “If necessary, has the question of charging tuition fees been discussed and settled amicably in both countries?”⁵⁹
- “Make sure that cooperation projects do not depend on funding from nondemocratic governments or businesses or foundations that are close to such governments. Instead, organizations should prioritize independent project funding by looking for domestic funders or funders in other liberal democracies. This effectively means that the total amount of funding for research and civil society organizations will have to increase. The bulk of this increase should eventually come from public bodies to lessen the attractiveness of funds from non-democracies. Of course, international cooperation projects can be co-funded by counterparts from non-democracies. But such funding should be limited to providing for partner organizations’ own staff costs and on-the-ground activities in non-democratic settings. Under no circumstances should staff costs of organizations in liberal democracies be covered by funds from autocracies.”⁶⁰
- “Use funding guidelines to incentivize a culture of integrity by making funding conditional on corresponding good practices. A positive example from the sphere of research are the Guidelines for Safeguarding Good Research Practice by the German Research Foundation (DFG), which were published in August 2019. Following these guidelines, the DFG only provides funding to organizations that establish those same guidelines in a legally binding manner, granting them an adjustment period until July 2021.”⁶¹

1.4 Transparency and accountability

- “Disclose contracts with partners in non-democracies to ensure transparency and accountability, and to demonstrate that normative and security questions have been appropriately considered.”⁶²
- “Make information about cooperation arrangements with partners from non-democracies more accessible by explicitly stating who gets funding from whom and for which purposes, who the cooperation partners are, and which joint activities the cooperation entails.”⁶³
- “Does the university document its cooperation activities with China, the objectives and the foundations of the cooperation in a manner that can be understood by the general public?”⁶⁴
- “Disclose all Chinese government funding. Publicly disclose, on an annual basis, all sources and amounts of funding that come directly or indirectly from the Chinese government. Publish lists of all projects and exchanges with Chinese government counterparts.”⁶⁵
- “Demand full transparency from cooperation partners concerning their sources of funding, potential government ties, and the relevant staff’s backgrounds. This includes paying attention to any potential links with businesspeople who might have close ties

⁵⁸ Guiding questions on university cooperation with the People’s Republic of China, p. 8-9.

⁵⁹ Guiding questions on university cooperation with the People’s Republic of China, p. 9.

⁶⁰ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 46.

⁶¹ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 47.

⁶² Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 42.

⁶³ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 42.

⁶⁴ Guiding questions on university cooperation with the People’s Republic of China, p. 9.

⁶⁵ Resisting Chinese Government Efforts to Undermine Academic Freedom Abroad. A Code of Conduct for Colleges, Universities, and Academic Institutions Worldwide, p. 3.

to the respective non-democratic governments or who are part of inner circles of government elites.”⁶⁶

- “Have responsibilities been defined at the domestic university and the Chinese partner university? Have resilient control mechanisms been established for the partnership? Have transparent procedures been defined for the selection of persons or admission of students as well as funding criteria and funding decisions?”⁶⁷
- “Are the interests of both sides involved in a partnership transparent for all participants? Is there sufficient knowledge of the institutions sending Chinese visiting academics?”⁶⁸

1.5 Informal collaboration

- “Although informal collaborations are unlikely to be covered by the institution’s formal policies or procedures, risks remain. Your institution should consider how it supports staff to make informed decisions outside your formal policies and procedures, including requiring staff to disclose partnerships and collaborations wherever possible. This will ensure that your institution has visibility of any conflicts of interest and other legal, reputational or financial risks associated with informal collaborations.”⁶⁹

2 Risk assessment and management

- “How clear are requirements to undertake proportionate risk assessments at the start of international collaborative research projects?”⁷⁰
- “Who has responsibility for conducting risk assessments on overseas research projects?”⁷¹
- “How is the level of risk in a particular research project, and the nature of the governance and oversight that could be applied to mitigate this risk considered?”⁷²
- “What documentation and templates capture these considerations, and can be referred to, should a retrospective assessment of the research activity be undertaken?”⁷³
- “What mechanisms assist staff to identify and mitigate possible risks?”⁷⁴
- “The governing body and executive leadership of the institution are responsible and accountable for protecting the institution against the threats and risks set out in these guidelines. To support them in performing this role, the governing body of the institution should receive an annual report describing the risks the institution faces and how the risks are being mitigated.”⁷⁵
- “A shared understanding of the policies and processes in place to manage these risks, including individual responsibilities to proactively report and escalate security-related risks, is crucial to fostering a culture of awareness and security (...).”⁷⁶
- “Identify and manage exposure to security-related risks. Your institution’s risk exposure is unique and depends on a range of factors, including the nature and scope

⁶⁶ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 43.

⁶⁷ Guiding questions on university cooperation with the People’s Republic of China, p. 7.

⁶⁸ Guiding questions on university cooperation with the People’s Republic of China, p. 13.

⁶⁹ Managing risks in internationalisation: security related issues, p. 19.

⁷⁰ Guidelines to counter foreign interference in the Australian university sector, p. 18.

⁷¹ Managing risks in internationalisation: security related issues, p. 56.

⁷² Guidelines to counter foreign interference in the Australian university sector, p. 11.

⁷³ Guidelines to counter foreign interference in the Australian university sector, p. 11.

⁷⁴ Guidelines to counter foreign interference in the Australian university sector, p. 11.

⁷⁵ Managing risks in internationalisation: security related issues, p. 6.

⁷⁶ Managing risks in internationalisation: security related issues, p. 16.

of your activity, and the risk awareness and management culture you have fostered. Your risk exposure will change over time.”⁷⁷

- “Policies and processes must align with your institution’s risk profile. A higher risk profile may necessitate more robust due diligence processes and oversight and subject your institution to additional scrutiny. Assessment of your risk profile must be informed by a robust understanding of your legal obligations.”⁷⁸
- “Establish security-related risk management as a key, ongoing priority. Your institution will have a range of risk-management, governance and reporting frameworks and capabilities in place to manage risk. Risks, including those related to academic freedom and freedom of speech, should be covered in these processes and publicised widely across your institution.”⁷⁹
- “How robust are your risk framework mitigation strategies that deal with foreign interference in research?”⁸⁰
- “Who is responsible for maintaining, promoting and applying these arrangements?”⁸¹
- “How are these arrangements informed by the range of research undertaken in the university and the associated level of risks?”⁸²
- “Are periodic risk assessments performed to evaluate risk in each building, taking into consideration multiple factors such as the type of research activities taking place, including non-disclosure agreements (NDAs), the range of visitors and shipping to and from the building?”⁸³
- “Are the risk assessments undertaken by personnel with expertise and responsibilities in the various areas of interest, including the protection of digital systems, physical property and visitor procedures and protocols?”⁸⁴
- “These risks are dynamic. As the threats evolve, so too should the systems and processes in place to manage them. Risk frameworks should be regularly reviewed to ensure they are fit for purpose and in line with best practice. In certain circumstances, independent organisations may need to provide assurance of the controls in place.”⁸⁵
- “What ability and capacity does the university have to analyse and respond to the information gathered from internal reporting arrangements?”⁸⁶

2.1 Reviews of ongoing partnerships

- “Have collaborators’ behaviours, interests and external relationships changed over time into something with which the university or individual is not comfortable?”⁸⁷
- “Has the government’s advice or assessments changed over time?”⁸⁸
- “In view of existing partnerships, how are decisions reached in cases where developments suggest that academic freedom can no longer be adequately guaranteed? Who should be involved in this decision? What steps are taken to deal with recurring problems?”⁸⁹

⁷⁷ Managing risks in internationalisation: security related issues, p. 15.

⁷⁸ Managing risks in internationalisation: security related issues, p. 16.

⁷⁹ Managing risks in internationalisation: security related issues, p. 16.

⁸⁰ Guidelines to counter foreign interference in the Australian university sector, p. 12, 17.

⁸¹ Guidelines to counter foreign interference in the Australian university sector, p. 12, 17.

⁸² Guidelines to counter foreign interference in the Australian university sector, p. 12, 17.

⁸³ Managing risks in internationalisation: security related issues, p. 55.

⁸⁴ Managing risks in internationalisation: security related issues, p. 55.

⁸⁵ Managing risks in internationalisation: security related issues, p. 16.

⁸⁶ Guidelines to counter foreign interference in the Australian university sector, p. 12.

⁸⁷ Guidelines to counter foreign interference in the Australian university sector, p. 16.

⁸⁸ Guidelines to counter foreign interference in the Australian university sector, p. 16.

⁸⁹ Guiding questions on university cooperation with the People’s Republic of China, p. 10.

2.2 Background checks

- “Conduct rigorous background checks on potential cooperation partners from non-democracies before entering into a cooperation agreement. Explicitly check for contacts to the military, government affiliations and potential complicity in human rights violations.”⁹⁰
- “Draw on a diverse array of resources and experts to conduct background checks. Potential resources include information-sharing services and incident trackers. Country and regional expertise should be combined with topic expertise, for instance, from the defense and emerging technologies sectors.”⁹¹
- “When vetting seemingly independent organizations in non-democracies, pay close attention to links between their leadership and broader governmental elites from non-democracies.”⁹²
- “To the extent that it is reasonable for a university to determine, do partners or their associates have relevant research backgrounds, is their organisation reputable, and are reasonable background checks conducted for new people working on a project?”⁹³
- “What information or advice is available from government to assist?”⁹⁴
- “What background is known about the university’s partner and is there anything dubious about their interests being reported?”⁹⁵
- “How upfront and transparent is the partner being about affiliations, parent partners and intent, that it is reasonable for the university to be able to identify? These may include existing vendor relationships, sourcing partners and alliances with interest in the primary partner.”⁹⁶
- “Due diligence on prospective international partners should be proportionate and reference relevant legal and regulatory provisions. It should include consideration of all security-related risks, including any risks to academic freedom that are associated with international partnerships. Be clear about monitoring data, and who is responsible for reporting what to whom.”⁹⁷
- “Is the partnership or the project embedded in a political context on the Chinese side? Does the university have knowledge of how this political framework is assessed by the relevant (...) actors? Is there a consensus within the university on the assessment of this framework?”⁹⁸
- “Is there sufficient knowledge of the Chinese partner university and its environs? Is there sufficient knowledge of the institutions sending Chinese students and visiting academics?”⁹⁹
- “What are the partner entity’s relationships with foreign governments, political parties and related entities and individuals? Are these appropriately disclosed, for example is the information available to the public through a website or register (...)?”¹⁰⁰

⁹⁰ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 38.

⁹¹ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 38.

⁹² Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 38.

⁹³ Guidelines to counter foreign interference in the Australian university sector, p. 15.

⁹⁴ Guidelines to counter foreign interference in the Australian university sector, p. 15.

⁹⁵ Guidelines to counter foreign interference in the Australian university sector, p. 17.

⁹⁶ Guidelines to counter foreign interference in the Australian university sector, p. 17.

⁹⁷ Managing risks in internationalisation: security related issues, p. 19.

⁹⁸ Guiding questions on university cooperation with the People’s Republic of China, p. 7.

⁹⁹ Guiding questions on university cooperation with the People’s Republic of China, p. 6.

¹⁰⁰ Guidelines to counter foreign interference in the Australian university sector, p. 15.

2.3 Prep and follow-up activities

- “Develop and implement preparatory and follow-up seminars for individuals who are engaged in cooperation projects. Such seminars should offer room for participants to reflect on the specific risks and challenges that come with working in non-democratic contexts. Moreover, they should raise awareness for the logic and methods of authoritarian propaganda narratives and foster an understanding of the constraints faced by program partners and participants from non-democracies. Participants should also learn about the types of human rights violations that occur in their respective fields of cooperation as well as the privileges they might enjoy because they are from democratic countries. When preparing youth or student exchange programs, this could include contextualizing experiences that former students have made.”¹⁰¹
- “Schedule trainings and refresher sessions before new cooperation projects start to ensure that staff members remain alert and sensitive to risks.”¹⁰²
- “Do the participants understand the potential risks and know about precautions that have been taken or need to be taken? Are staff fully aware of the specific risks of working with Chinese parties? Are there any regulations or protocols they need to know about?”¹⁰³
- “Scientists, researchers and students going to China should be briefed beforehand about the ways in which they could be approached or influenced. If possible, a debriefing session should also be held after their return, to check whether any potential risks actually materialised and to identify possible patterns.”¹⁰⁴
- “Collect information on fundamental rights infringements that occurred in cooperation projects with entities from non-democracies. Such incidents should be documented meticulously.”¹⁰⁵
- “Does the university have an exchange platform or a procedure that facilitates internal communication between teaching staff and researchers involved in partnerships and projects with China, establishes a consensus at the university on the opportunities and limitations of the partnership and thus stabilises existing partnerships in a sustained manner?”¹⁰⁶

2.4 Incident trackers

- “Establish, support and/or use incident trackers that document problems or challenges encountered by organizations from liberal democracies when cooperating with counterparts from non-democracies. Such incident trackers would provide shared, collectively maintained data bases that would make it easier for organizations to strategize for and mitigate the potential risks involved in cooperation with non-democracies. Specific types of incidents captured by incident tracks could, for instance, be efforts by partners to conceal military affiliations or visa harassment, to name just two. Such incident trackers should be complemented by corresponding reports that would be published at least on an annual basis. Especially organizations involved in dialogue programs should enhance their efforts to document, systematically assess and publicize risks and incidents as research in this area is currently almost completely lacking.”¹⁰⁷

¹⁰¹ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 36.

¹⁰² Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 40.

¹⁰³ Checklist for Collaboration with Chinese Universities and Other Research Institutions, p. 7.

¹⁰⁴ Checklist for Collaboration with Chinese Universities and Other Research Institutions, p. 14.

¹⁰⁵ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 51.

¹⁰⁶ Guiding questions on university cooperation with the People’s Republic of China, p. 7-8.

¹⁰⁷ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 52.

- “Create and maintain a list that documents entities from non-democracies with which collaboration is not advisable due to their continued involvement in fundamental rights infringements.”¹⁰⁸

2.5 People’s Liberation Army (PLA) collaboration

- “Produce credible and thorough assessments of the extent of PLA collaboration on campuses.”¹⁰⁹
- “Develop processes for managing PLA collaboration so that security risks can be identified and resolved.”¹¹⁰
- “Ensure that those interacting with members of non-allied militaries take appropriate security precautions.”¹¹¹
- “Require employees to receive approval before collaborating with or training members of non-allied militaries.”¹¹²

3 Strategy and governance on campus

3.1 Roles and responsibilities

- “Who in your university has operational responsibility for foreign interference and safeguards?”¹¹³
- “Who in your university has senior executive responsibility for foreign interference and safeguards?”¹¹⁴
- “Who has responsibility for signing off and monitoring contractual agreements on research collaborations?”¹¹⁵
- “Do staff know when and where to seek advice when they have concerns?”¹¹⁶
- “What guidance exists on when researchers should seek further advice internally or external to the university?”¹¹⁷
- “How clear are roles and responsibilities across the university about when to engage with [relevant] agencies to ensure compliance with (...) Export Controls (...)?”¹¹⁸
- “Is there sufficient join-up between those responsible for the oversight and discharge of strategies relating to the protection of campuses and infrastructure, whether through the protection of digital systems, physical property or visitor procedures and protocols? What mechanisms are in place to support this join-up?”¹¹⁹

¹⁰⁸ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 52.

¹⁰⁹ Picking flowers, making honey. The Chinese military’s collaboration with foreign universities, p. 20.

¹¹⁰ Picking flowers, making honey. The Chinese military’s collaboration with foreign universities, p. 20.

¹¹¹ Picking flowers, making honey. The Chinese military’s collaboration with foreign universities, p. 20.

¹¹² Picking flowers, making honey. The Chinese military’s collaboration with foreign universities, p. 20.

¹¹³ Guidelines to counter foreign interference in the Australian university sector, p. 10.

¹¹⁴ Guidelines to counter foreign interference in the Australian university sector, p. 10.

¹¹⁵ Managing risks in internationalisation: security related issues, p. 56.

¹¹⁶ Guidelines to counter foreign interference in the Australian university sector, p. 22.

¹¹⁷ Guidelines to counter foreign interference in the Australian university sector, p. 18.

¹¹⁸ Guidelines to counter foreign interference in the Australian university sector, p. 11.

¹¹⁹ Managing risks in internationalisation: security related issues, p. 55.

3.2 Existing policies

- “Enhance efforts to enforce existing policies. This includes taking stock of the different (types of) disclosure policies that are already in place as well as of how their enforcement and implementation were handled before.”¹²⁰
- “What policies does your university have that trigger engagement with relevant (...) agencies on legislative compliance and foreign interference?”¹²¹
- “How do policies and procedures acknowledge foreign interference as a risk?”¹²²
- “How do policies and procedures enable staff and students to understand who is affected by specific security risks?”¹²³
- “How have all stakeholders been considered in security policies and procedures?”¹²⁴
- “What policies manage responses to security incidents?”¹²⁵
- “What policies, tools and frameworks does your institution use to protect intellectual property (IP)?”¹²⁶
- “What is the escalation pathway and how is the appropriate response to these risks clearly articulated?”¹²⁷
- “What mechanisms support staff to identify foreign interference risks from collaborative partners who are undertaking extended stays, do not have the appropriate background, or engage in unusual activity?”¹²⁸
- “What policies exist in the university to identify research contracts that may require additional oversight due to the nature of the research and/or the type of partnership?”¹²⁹
- “What is the process for contracts and agreements put in place for non-funded research projects, such as one-to-one research collaborations between academics in the UK and overseas?”¹³⁰
- “What processes are in place to deal with breaches of, or changes to contractual research agreements?”¹³¹
- “Are security-related risks and overseas threats sufficiently embedded in cybersecurity strategies, estates policies and visitor procedures and protocols?”¹³²
- “How can current university policies, for example pertaining to human ethics, safe travel arrangements, facility access and event management, continue to be enhanced to identify potential risks and support researchers in high risk or sensitive research areas to proactively manage their risks?”¹³³
- “Update policies on intellectual property, commercialisation, research integrity, conflicts of interest and external appointments where necessary.”¹³⁴

¹²⁰ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 43.

¹²¹ Guidelines to counter foreign interference in the Australian university sector, p. 10.

¹²² Guidelines to counter foreign interference in the Australian university sector, p. 11.

¹²³ Guidelines to counter foreign interference in the Australian university sector, p. 11.

¹²⁴ Guidelines to counter foreign interference in the Australian university sector, p. 11.

¹²⁵ Guidelines to counter foreign interference in the Australian university sector, p. 11.

¹²⁶ Managing risks in internationalisation: security related issues, p. 56.

¹²⁷ Guidelines to counter foreign interference in the Australian university sector, p. 11.

¹²⁸ Guidelines to counter foreign interference in the Australian university sector, p. 16.

¹²⁹ Guidelines to counter foreign interference in the Australian university sector, p. 18.

¹³⁰ Managing risks in internationalisation: security related issues, p. 56.

¹³¹ Managing risks in internationalisation: security related issues, p. 56.

¹³² Managing risks in internationalisation: security related issues, p. 55.

¹³³ Guidelines to counter foreign interference in the Australian university sector, p. 20.

¹³⁴ Hunting the phoenix. The Chinese Communist Party’s global search for technology and talent, p. 28.

3.3 Internal reporting mechanisms

- “Institutions should develop confidential mechanisms and spaces to allow both staff and students to raise any concerns that they may have relating to interference in the same way as they can for academic freedom and freedom of speech. This could involve adapting institutional ethics processes. There should be clear and transparent lines of reporting in place to ensure that these cases are brought to the attention of senior leaders in a timely fashion and escalated where necessary.”¹³⁵
- “Build and sustain a culture that enables staff to raise concerns, coupled with processes that enable the institution to consider whether activities raise reputational, ethical and/or security risks.”¹³⁶
- “Introduce a confidential complaint procedure that staff and students can use if they find that a peer or anyone else with access to the organization engages in intimidation or espionage activities, or if they themselves feel pressured to self-censor or have experienced discrimination.”¹³⁷
- “What communications and protocols support staff and students to follow reporting requirements on foreign interference?”¹³⁸
- “How consistent are internal reporting mechanisms to support internal evaluation and communication with external stakeholders?”¹³⁹
- “Conduct regular anonymous surveys of all staff involved in cooperation with non-democracies to identify areas for improvement.”¹⁴⁰
- “Is there an internal routine at the university and a communication strategy for problematic and crisis situations, such as an attempt to exert external influence? Have responsibilities been clearly defined within the university?”¹⁴¹
- “Have review procedures been established at the university for the handling of problematic incidents (e. g. attempts to exert influence, recording or monitoring of virtual or face-to-face lectures or seminars, approval procedures for research results)?”¹⁴²
- “What level of internal reporting applies to foreign investments and partnerships and how does this aid accountability and risk management?”¹⁴³
- “What ability and capacity does the university have to analyse and respond to the information gathered from internal reporting arrangements?”¹⁴⁴

3.4 Conflict of Interest (CoI) policies

- “Are researchers – both those based in the [EU] and those based overseas – asked to disclose external work obligations and conflicts of interest on a regular basis?”¹⁴⁵
- “How do the university’s CoI policies include international financial and other interests?”¹⁴⁶
- “How do the university’s CoI policies include secondary staff employment, such as honorary and adjunct staff?”¹⁴⁷

¹³⁵ Managing risks in internationalisation: security related issues, p. 25.

¹³⁶ Managing risks in internationalisation: security related issues, p. 20.

¹³⁷ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 49.

¹³⁸ Guidelines to counter foreign interference in the Australian university sector, p. 20.

¹³⁹ Guidelines to counter foreign interference in the Australian university sector, p. 13.

¹⁴⁰ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 45.

¹⁴¹ Guiding questions on university cooperation with the People’s Republic of China, p. 9.

¹⁴² Guiding questions on university cooperation with the People’s Republic of China, p. 10.

¹⁴³ Guidelines to counter foreign interference in the Australian university sector, p. 12.

¹⁴⁴ Guidelines to counter foreign interference in the Australian university sector, p. 12.

¹⁴⁵ Managing risks in internationalisation: security related issues, p. 56.

¹⁴⁶ Guidelines to counter foreign interference in the Australian university sector, p. 13.

¹⁴⁷ Guidelines to counter foreign interference in the Australian university sector, p. 13.

- “What processes monitor how conflicts are treated and reported? These may include prompts to mitigate potential risks, protect academic freedom and free speech, and ensure compliance with export control laws and other regulations.”¹⁴⁸
- “What processes exist to manage risk when considering the acceptance of donations and gifts?”¹⁴⁹
- “Make sure researchers and staff members comply with disclosure rules.”¹⁵⁰

3.5 Travel policies

- “Many university staff and students regularly travel overseas in the course of their employment or study. In most cases, this short-term travel, irrespective of the purpose, will involve a similar degree of risk exposure as similar activity in the [EU]. However, in certain cases, individuals or universities may be exposed to significantly higher and unfamiliar risks. For example, students and academics involved in advanced or emerging technologies are likely to be of greater interest to local and national authorities.”¹⁵¹
- “Coherent safe travel policies must outline the steps needed for safely managing overseas travel and related activities, and outline clear approval processes, including processes for escalating high or unusual risks for institutional approval. Travel policies should also consider how export controls and other [EU] laws apply in each circumstance, and the implications of local and extraterritorial legislation on the person travelling overseas.”¹⁵²
- “It is crucial that the processes in place are proportionate and applied to all international travel. Institutions should maintain records of overseas travel and draw on internal and external knowledge of the specific risks associated with travel to certain countries or regions. In addition, institutions should establish a formal method for monitoring and reviewing processes and procedures regularly, not just following an incident.”¹⁵³
- “Travel to certain countries requires special consideration and preparation. Processes should be in place to educate students and staff about specific security-related risks. This should include adequate training for students and staff to ensure that they understand the relevant policies and codes of conduct, as well as what is required of them and other obligations before travelling overseas.”¹⁵⁴
- “Electronic devices such as laptops and smartphones for use in China should be kept strictly separate from other equipment. You should also assume that all information stored on equipment or servers in China can be viewed by the Chinese government and intelligence services. Good cyber hygiene and customised security by design for your own IT infrastructure can reduce the impact and repercussions of incidents, for instance by compartmentalising access to information.”¹⁵⁵
- “Strengthen existing staff travel databases to automatically flag conflicts with grant commitments and contracts.”¹⁵⁶

¹⁴⁸ Guidelines to counter foreign interference in the Australian university sector, p. 13.

¹⁴⁹ Guidelines to counter foreign interference in the Australian university sector, p. 17.

¹⁵⁰ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 43.

¹⁵¹ Managing risks in internationalisation: security related issues, p. 31.

¹⁵² Managing risks in internationalisation: security related issues, p. 31.

¹⁵³ Managing risks in internationalisation: security related issues, p. 31.

¹⁵⁴ Managing risks in internationalisation: security related issues, p. 31.

¹⁵⁵ Checklist for Collaboration with Chinese Universities and Other Research Institutions, p. 14.

¹⁵⁶ Hunting the phoenix. The Chinese Communist Party’s global search for technology and talent, p. 28.

3.6 Joint teaching and researching

- “Is the curriculum appropriate in terms of subject matter and does it meet the needs of all participating students? Can the academic added value of the joint programme be clearly identified for graduates?”¹⁵⁷
- “What intercultural added value can be expected for graduates? Are teaching materials included in the curriculum that reflect the international or global dimension of the subject matter, with a view to internationalising the curricula?”¹⁵⁸
- “Have the legal requirements of both countries in terms of quality assurance been met and the formal approval procedures for the joint study programme been initiated both in [the EU country] and in China?”¹⁵⁹
- “Is there a comprehensive quality assurance concept for the joint study programme and is there a joint body that is responsible for matters related to quality assurance? Are both the students and external participants adequately involved in the quality assurance process?”¹⁶⁰
- “Are the mechanisms for selecting students adequately transparent and do they satisfy the principles of all participating institutions?”¹⁶¹
- “Will the possibilities of digital teaching be included in the joint study programme in order to make it more widely accessible at participating universities and to complement face-to-face teaching in a manner that is appropriate to the subject matter? Are data protection requirements met in the use of digital teaching and learning platforms?”¹⁶²

4 Due diligence on campus

4.1 Training and educating staff and students

- “Train and inform your staff and students on their rights and educate them about how they can protect themselves through legal measures. Help them exercise their rights.”¹⁶³
- “Are all students and researchers involved in a partnership or exchange informed of their rights and obligations in an appropriate manner?”¹⁶⁴
- “What processes ensure staff are aware of their rights and obligations at the university and under [the relevant] law?”¹⁶⁵
- “What processes ensure staff are aware of foreign interference risks, even in informal collaboration and communication?”¹⁶⁶
- “What kind of training is available to support researchers to take measures to protect against IP theft or leveraged transfer through cybersecurity infringements or the theft of personal property?”¹⁶⁷

¹⁵⁷ Guiding questions on university cooperation with the People’s Republic of China, p. 11.

¹⁵⁸ Guiding questions on university cooperation with the People’s Republic of China, p. 11.

¹⁵⁹ Guiding questions on university cooperation with the People’s Republic of China, p. 11.

¹⁶⁰ Guiding questions on university cooperation with the People’s Republic of China, p. 11.

¹⁶¹ Guiding questions on university cooperation with the People’s Republic of China, p. 12.

¹⁶² Guiding questions on university cooperation with the People’s Republic of China, p. 12.

¹⁶³ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 49.

¹⁶⁴ Guiding questions on university cooperation with the People’s Republic of China, p. 9.

¹⁶⁵ Guidelines to counter foreign interference in the Australian university sector, p. 11.

¹⁶⁶ Guidelines to counter foreign interference in the Australian university sector, p. 14.

¹⁶⁷ Managing risks in internationalisation: security related issues, p. 56.

- “What guidelines support staff and student understanding of these policies where appropriate?”¹⁶⁸
- “How are academic staff, professional staff and research students required to undertake training to recognise foreign interference risks in everyday work, communications and international travel?”¹⁶⁹
- “Implement regular trainings on best practices in protecting and handling sensible information, especially in the realm of dual-use technology, to increase awareness of the importance of information security. Using concrete case studies to train staff could be an option to ensure that staff members know how to react in certain situations.”¹⁷⁰
- “Educate staff who participate in dialogue activities with non-democracies about the fine line between cultural sensitivity and self-censorship. Regular discussions, workshops and briefings on such matters can equip individuals with the necessary knowledge and tools to navigate international dialogue events without falling back onto polite platitudes. Organizations need to empower their staff to clearly name the elephant in the room while still respecting the rules of intercultural engagement.”¹⁷¹
- “Educate staff, clients or students on ‘safe behavior online’ as well as the corresponding threat environment.”¹⁷²
- “Develop a risk-literate, risk-aware culture. Senior leaders improve institutional resilience to security-related issues by prioritizing the development of a positive, risk-literate, risk-aware culture and implementing clear governance, reporting and risk-management structures that promote the strengths and values of (...) higher education.”¹⁷³
- “What training does your university provide to promote awareness of foreign interference risks?”¹⁷⁴
- “What training does the university offer to staff to build capacity in identifying potential instances of foreign interference? What training is offered for researchers and (...) students to understand the need to comply with the university’s risk mitigation strategies?”¹⁷⁵
- “What training and awareness strategies are needed to ensure researchers understand the need to comply with the university’s risk mitigation strategies?”¹⁷⁶
- “Deepen information and intelligence sharing to educate partners on high risk areas and new technologies to support them in adapting restrictions where this might be necessary.”¹⁷⁷
- In conjunction with the government, brief staff on relevant policies on and precautions against CCP talent-recruitment programs.”¹⁷⁸
- “Are you aware that the Chinese government can take advantage of partnerships (and actually does so in practice) to ‘recruit’ and/or ‘use’ students, scientists and researchers, consciously or not, and that this is often done in a seemingly routine and straightforward way, such as through LinkedIn? A contact made in this way may lead to a request – in some cases a blatantly candid one – for information, sometimes with the excuse that this cannot be obtained via Chinese internet.”¹⁷⁹
- “Prepare a checklist of potential red flags to serve as guidance for junior (and senior) staff. While the overarching goal should be to foster a critical view on organizational

¹⁶⁸ Guidelines to counter foreign interference in the Australian university sector, p. 14.

¹⁶⁹ Guidelines to counter foreign interference in the Australian university sector, p. 14.

¹⁷⁰ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 40.

¹⁷¹ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 43-44.

¹⁷² Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 40.

¹⁷³ Managing risks in internationalisation: security related issues, p. 14.

¹⁷⁴ Guidelines to counter foreign interference in the Australian university sector, p. 20.

¹⁷⁵ Guidelines to counter foreign interference in the Australian university sector, p. 11.

¹⁷⁶ Guidelines to counter foreign interference in the Australian university sector, p. 11.

¹⁷⁷ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 37.

¹⁷⁸ Hunting the phoenix. The Chinese Communist Party’s global search for technology and talent, p. 28.

¹⁷⁹ Checklist for Collaboration with Chinese Universities and Other Research Institutions, p. 15.

and individual behavior, simple and practical lists can make it easier for staff to get a sense of what constitutes red flags and help address initial insecurities – especially if staff are still at the beginning of their time at the organization. More senior staff can use checklists as reminders or back-up. The Hague Centre for Strategic Studies and the Leiden Asia Centre provide a model checklist that organizations can use as a blueprint.”¹⁸⁰

- “To what extent can employees or others involved in the partnership be exposed to risks of a political nature? Researchers and/or students involved in a partnership may be exposed to political risks against their will or without specific intentions. For instance, Chinese researchers may (unintentionally) incur sanctions if they are careless with sensitive information, or conversely be deployed to obtain sensitive information. (...) students may be put at risk through contact with sensitive information, or be monitored by their fellow students. Equally, political pressure can lead to people being excluded from participation in conferences, or invitations to conferences in China can be used as a means of spreading a political message more widely.”¹⁸¹
- “What university policies and practices and processes promote awareness of safety and security to safeguard against foreign interference?”¹⁸²
- “To what degree are researchers, and their international partners, aware of their legal obligations, in some types of research, including conflicts of interests and complying with legislative requirements.”¹⁸³
- “What training and awareness strategies are there to ensure researchers understand the need to comply with the university’s risk mitigation strategies?”¹⁸⁴
- “Are researchers, and their foreign partners, aware of their legal obligations in some types of research, including conflicts of interests?”¹⁸⁵
- “What additional or targeted training is provided to researchers involved in commercially valuable research to minimise the risk of foreign interference?”¹⁸⁶
- “What training currently exists? How is training appropriately targeted to provide information about the more subtle forms of foreign interference?”¹⁸⁷

4.2 Student groups and other campus organizations

- “Is there a communication channel with Chinese student associations? Is there adequate knowledge of the activities that these student associations are engaged in?”¹⁸⁸
- “Monitor Chinese government-linked organizations. Require that all campus organizations, including the Chinese Students and Scholars Association (CSSA), that receive funding or support from Chinese diplomatic missions and other Chinese government-linked entities, report such information.”¹⁸⁹
- “Prohibit any direct financial links between student groups and nondemocratic governments. Student groups at universities in democracies should be forbidden to receive any funding from foreign governments without explicit approval from the respective university. As part of the approval process, university administrators can

¹⁸⁰ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 44.

¹⁸¹ Checklist for Collaboration with Chinese Universities and Other Research Institutions, p. 12.

¹⁸² Guidelines to counter foreign interference in the Australian university sector, p. 10.

¹⁸³ Guidelines to counter foreign interference in the Australian university sector, p. 11.

¹⁸⁴ Guidelines to counter foreign interference in the Australian university sector, p. 16.

¹⁸⁵ Guidelines to counter foreign interference in the Australian university sector, p. 16.

¹⁸⁶ Guidelines to counter foreign interference in the Australian university sector, p. 19.

¹⁸⁷ Guidelines to counter foreign interference in the Australian university sector, p. 21.

¹⁸⁸ Guiding questions on university cooperation with the People’s Republic of China, p. 15.

¹⁸⁹ Resisting Chinese Government Efforts to Undermine Academic Freedom Abroad. A Code of Conduct for Colleges, Universities, and Academic Institutions Worldwide, p. 2.

then check for potential links to non-democratic governments. Of course, this implies that student groups are required to disclose information about their funders."¹⁹⁰

4.3 Talent-recruitment programs

- "Carry out a comprehensive and independent audit of participation in CCP talent-recruitment programs by staff."¹⁹¹
- "Participants in CCP talent-recruitment programs should be required to submit their contracts with the foreign institution (both English and Chinese versions) and fully disclose any remuneration."¹⁹²

4.4 Visiting scholars and exchange students

- "Exercise greater oversight of visiting scholar and student application."¹⁹³
- "You should embed awareness of security-related issues into your existing estates and visitor policies. There needs to be robust policies and procedures for visitors to your institution, covering both staff and students. In relation to campus visitors, these policies might include:
 - frameworks, policies and risk assessments that clearly distinguish between different types of visitor (for example, between professional and academic staff, undergraduate and postgraduate students, and short- and long-stay visitors)
 - adequate checks on visitors before, on arrival and during their stay to restricted areas of the campus, including identity checks and checks on compliance with visa requirements, and checks to ensure their access is limited to the approved duration of their visit
 - senior oversight and accountability for any visitor and visa agreements
 - restrictions on access for visitors to courses or projects not cleared via their visa (...) application and clear processes for oversight and accountability for changing these during their visit
 - clear advice, information and guidance for visitors and staff to inform them of the need to adhere to appropriate protocols during their time on campus."¹⁹⁴
- "Is the information provided about study programmes as well as research and work opportunities at the domestic university adequate, easy to comprehend and easily accessible for Chinese partners?"¹⁹⁵
- "Are there venues for formal and informal interaction and dialogue with Chinese students? Have programmes been established that promote student engagement with regards to the integration of and intercultural interaction with Chinese students, whether curricular or extracurricular (e. g. buddy programmes)?"¹⁹⁶
- "Have contact persons been appointed for the academic and social concerns of students and researchers entering the country as well as those leaving or returning?"¹⁹⁷

¹⁹⁰ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 47.

¹⁹¹ Hunting the phoenix. The Chinese Communist Party's global search for technology and talent, p. 28.

¹⁹² Hunting the phoenix. The Chinese Communist Party's global search for technology and talent, p. 28.

¹⁹³ Picking flowers, making honey. The Chinese military's collaboration with foreign universities, p. 20.

¹⁹⁴ Managing risks in internationalisation: security related issues, p. 36.

¹⁹⁵ Guiding questions on university cooperation with the People's Republic of China, p. 14.

¹⁹⁶ Guiding questions on university cooperation with the People's Republic of China, p. 15.

¹⁹⁷ Guiding questions on university cooperation with the People's Republic of China, p. 14.

- "Are there sufficient offerings at the university for the social integration of Chinese students and academics? Is there an ombudsperson whom Chinese students or researchers can contact in case of discriminatory incidents?"¹⁹⁸
- "Are students and academics who return from a stay in China systematically contacted? Important contact persons for Chinese students and researchers on site could emerge from this group."¹⁹⁹
- "Have programmes and formats been established that encourage Chinese students and academics to share their experiences with university members and support them in doing so?"²⁰⁰
- "Are there sufficient capacities for the academic supervision of Chinese students and academics? Are there fixed contact persons for both target groups?"²⁰¹
- "Is there an alumni concept for Chinese graduates and former visiting academics from China?"²⁰²
- "Is there a sufficient amount of linguistic and intercultural programmes for incoming and outgoing or returning students and researchers?"²⁰³
- "What means are used to evaluate the linguistic skills of applicants and students? Has a corresponding review process been established?"²⁰⁴
- "Has a language concept been developed to support and guide the cooperation? Is there an adequate number of offerings for acquiring or improving [relevant language] or Chinese language skills?"²⁰⁵
- "Are there sufficient opportunities for academic and nonacademic staff participating in a partnership to further develop their language skills?"²⁰⁶
- "Are there offerings for academic and cultural engagement with China and for learning the Chinese language? Is there a central point of contact with China expertise at the university or in its environs?"²⁰⁷
- "Is the success of all students monitored? How is the feedback of Chinese students and visiting academics regarding their academic and social experience at the university collected? Have routines and processes been established to ensure that the acquired findings lead to the adaptation of day-to-day university life?"²⁰⁸
- "Is an emergency plan in place for crisis situations that also includes arrangements for the return of students and researchers of the domestic university? Have arrangements been made in this regard with the Chinese partner institution as well as, where applicable, other local actors? Are outgoing students and researchers provided with essential information about everyday life at the Chinese partner institution as well as about the potential risks and appropriate precautionary measures and the necessary conduct and procedures in case of a crisis?"²⁰⁹
- "Protect and support foreign staff and students who are critical of their government. This could include supporting them with visa or immigration procedures, or providing or recommending counselling or legal support."²¹⁰
- "How are Chinese students and visiting academics supported on campus? Are there contact persons whom they can approach with questions relating to professional matters? Is there an ombudsperson whom they can send complaints to and who can be consulted in the event of disagreements within the Chinese student body or the

¹⁹⁸ Guiding questions on university cooperation with the People's Republic of China, p. 16.

¹⁹⁹ Guiding questions on university cooperation with the People's Republic of China, p. 16.

²⁰⁰ Guiding questions on university cooperation with the People's Republic of China, p. 15.

²⁰¹ Guiding questions on university cooperation with the People's Republic of China, p. 16.

²⁰² Guiding questions on university cooperation with the People's Republic of China, p. 16.

²⁰³ Guiding questions on university cooperation with the People's Republic of China, p. 14.

²⁰⁴ Guiding questions on university cooperation with the People's Republic of China, p. 16.

²⁰⁵ Guiding questions on university cooperation with the People's Republic of China, p. 17.

²⁰⁶ Guiding questions on university cooperation with the People's Republic of China, p. 17.

²⁰⁷ Guiding questions on university cooperation with the People's Republic of China, p. 16.

²⁰⁸ Guiding questions on university cooperation with the People's Republic of China, p. 14-15.

²⁰⁹ Guiding questions on university cooperation with the People's Republic of China, p. 15.

²¹⁰ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 49.

Chinese academic community on campus? Are there any services for persons accompanying academics who are entering the country (e.g. dual career advice)?”²¹¹

5 Communication and education

5.1 Country-specific and topic-specific expertise

- “Foster and use country-specific and regional expertise and make it available to others. This expertise should combine a thorough understanding of a country’s or region’s context with corresponding language skills. Integrating country or regional expertise is a necessary prerequisite for planning any cooperation project with counterparts from non-democracies. The focus should not only be on utilizing this expertise to enhance cooperation by simply ‘understanding the other side’; the goal should rather be to gather necessary specific information to feed into a comprehensive assessment of the potential risks of the planned cooperation project.”²¹²
- “Use regional expertise to formulate strategies for dealing with restrictions and constraints imposed on cooperation projects by authoritarian governments. Experts on a specific region or local partners (especially in less consolidated authoritarian systems) know how to circumvent the rules of their governments as well as how to tweak projects in such a way that they get approved without being too heavily scrutinized by the respective authorities. They can also help organizations in democracies develop a better understanding of how to best frame critical thoughts or ideas in, for instance, research cooperation, which is particularly helpful for scholars who work on contentious issues. Finding the right tone without capitulating to illiberal restrictions is a constant balancing act that requires extensive contextual knowledge.”²¹³
- “Continue to draw on country and regional expertise throughout the cooperation process, including for regular strategy reviews.”²¹⁴
- “Promote independent country and regional expertise by establishing new and supporting existing research centers on non-democracies. Not only will this ensure adequate regional expertise in the future, but such centers could also serve as safe havens for scholars from non-democratic contexts who are at risk.”²¹⁵
- “Is there a contact point with China expertise at the university or in its environs that can advise university members participating in the cooperation where needed and provide educational and training offerings?”²¹⁶
- “Has a China representative been appointed at the university and is this responsibility backed with the necessary financial and personnel resources?”²¹⁷
- “Establish a central point of contact to channel and direct requests for assistance and expertise on cooperating with partners in non-democracies. This central point of contact would facilitate information sharing between government agencies, NGOs, research institutes, and foundations. On the one hand, this will help the bigger institutions build up the necessary in-house capacities for tackling the risks associated with cooperation activities. The smaller ones, on the other hand, can rely on the pooled expertise in case their own capacities are not enough. In addition, such a hub could maintain up-to-date incident databases of regional and country experts, and connect organizations that aim

²¹¹ Guiding questions on university cooperation with the People’s Republic of China, p. 9.

²¹² Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 35.

²¹³ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 36.

²¹⁴ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 36.

²¹⁵ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 50.

²¹⁶ Guiding questions on university cooperation with the People’s Republic of China, p. 8.

²¹⁷ Guiding questions on university cooperation with the People’s Republic of China, p. 8.

to cooperate with non-democracies in similar fields to share their strategies and experiences. Ideally, such a central point of contact could also draw on relevant information from intelligence agencies where necessary."²¹⁸

- "Establish an ombudsperson for cases of infringement, for instance, on academic freedom or in the form of undisclosed financial links. Inform staff (and, in the case of universities, students) about their rights and how to recognize common infringement patterns so they know when to approach the ombudsperson."²¹⁹

5.2 Organizational values

- "Draft and publish codes of conduct or value statements that show the bigger picture of what the organization stands for and how it plans to protect and enact those values in its day-to-day activities."²²⁰
- "Establish strong, transparent internal control and accountability mechanisms to ensure that the organization acts in accordance with its own stated values."²²¹
- "Incorporate core organizational values into the education and training of junior staff. Such efforts need to go beyond abstract or purely theoretical discussions about values (which should still take place). Organizations need to construct a framework of rules that supports their values. That should include clear communication about and guidance on what is desirable and appropriate (and what is not)."²²²
- "Maintain an open discussion about the validity of the rules that the organization derives from its key values. This will help generate greater buy-in for these values and rules among staff members."²²³
- "Promote open and transparent communication, debate, research and enquiry about our shared values, and support staff and students to take responsibility for protecting against attempts to undermine them."²²⁴

6 Academic integrity and freedom

- "Promote open and transparent communication, debate, research and enquiry about what interference in academic freedom, freedom of speech and institutional autonomy might look like, and support staff and students to take responsibility for protecting against these infringements throughout their engagements and activities."²²⁵
- "Develop and promote clear codes of conduct, policies and legal agreements that enshrine the avoidance of interference alongside the core values of academic freedom and freedom of speech."²²⁶
- "Develop processes and mechanisms through which staff and students can report, raise concerns and receive support in relation to issues connected to academic freedom and freedom of speech, including issues arising from interference."²²⁷

²¹⁸ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 52.

²¹⁹ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 45.

²²⁰ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 45.

²²¹ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 45.

²²² Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 44.

²²³ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 44.

²²⁴ Managing risks in internationalisation: security related issues, p. 24.

²²⁵ Managing risks in internationalisation: security related issues, p. 24.

²²⁶ Managing risks in internationalisation: security related issues, p. 24.

²²⁷ Managing risks in internationalisation: security related issues, p. 24.

- "Use tools such as the Academic Freedom Index (AFI) to assess risks to academic freedom. Funders could make such risk assessments mandatory for cooperation projects that concern all countries with a low AFI score."²²⁸
- "Emphasize academic freedom and integrity, including non-discriminatory hiring practices and balanced curricula and especially in university and research cooperation."²²⁹
- "To encourage open and transparent discussion about the importance of academic freedom and freedom of speech to the integrity and identity of (...) higher education institutions, senior staff should promote debate, research and enquiry about these issues across their institutions. They should also raise awareness about the range of ways in which academic freedom and freedom of speech can be undermined by foreign interference."²³⁰
- "Doing research with Chinese partners may place certain restrictions on academic freedom. These may relate to content, for instance not mentioning the 3 Ts (Tibet, Tiananmen and Taiwan). Or accepting that Chinese partners may want to actively control certain 'narratives' (giving rise to a tension between intellectual integrity and indoctrination) for instance by wanting to foreground the role played by the Communist Party of China (CPC) in historical research."²³¹
- "Speak out for academic freedom. Publicly commit to supporting academic freedom and freedom of expression through public statements at the highest institutional levels, institutional policies, and internal guidelines. Explicitly recognize threats posed to academic freedom and freedom of expression by the Chinese government seeking to shape discussions, teaching, and scholarship on campus. Reaffirm a commitment to freedom of inquiry, enabling scholars and students to freely conduct research, and make clear that opposing direct and indirect censorship pressures or retaliation by third parties, including national and foreign governments, is integral to academic freedom."²³²
- "Strengthen academic freedom on campus. Emphasize the commitments and policies in support of academic freedom in student orientation, faculty hiring, handbooks and honor codes, and public gatherings. To avoid self-censorship or retaliation for stating opinions, academic institutions should publicize a policy that classroom discussions are meant to stay on campus, and never to be reported to foreign missions."²³³
- "Counter threats to academic freedom. Encourage students and faculty members to recognize that direct and indirect censorship pressures, threats, or acts of retaliation by Chinese government authorities or their agents against students or scholars for what they write or say threaten academic freedom. Develop and implement effective mechanisms, such as an ombudsperson, to whom such pressures, threats, or acts of retaliation can be privately or anonymously reported."²³⁴
- "Record incidents of Chinese government infringement of academic freedom. Actively track instances of direct or indirect Chinese government harassment, surveillance, or threats on campuses. Where warranted, they should be reported to law enforcement. Report annually the number and nature of these kinds of incidents."²³⁵

²²⁸ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 36.

²²⁹ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 42.

²³⁰ Managing risks in internationalisation: security related issues, p. 24.

²³¹ Checklist for Collaboration with Chinese Universities and Other Research Institutions, p. 8.

²³² Resisting Chinese Government Efforts to Undermine Academic Freedom Abroad. A Code of Conduct for Colleges, Universities, and Academic Institutions Worldwide, p. 1.

²³³ Resisting Chinese Government Efforts to Undermine Academic Freedom Abroad. A Code of Conduct for Colleges, Universities, and Academic Institutions Worldwide, p. 1.

²³⁴ Resisting Chinese Government Efforts to Undermine Academic Freedom Abroad. A Code of Conduct for Colleges, Universities, and Academic Institutions Worldwide, p. 2.

²³⁵ Resisting Chinese Government Efforts to Undermine Academic Freedom Abroad. A Code of Conduct for Colleges, Universities, and Academic Institutions Worldwide, p. 2.

- “Monitor impact of Chinese government interference in academic freedom. Work with academic institutions, professional associations, and funders to systematically study and regularly publicly report on: a) areas of research that have received less attention because of fears about access; b) decline of on-campus discussions of topics deemed sensitive by the Chinese government, such as the 1989 Tiananmen Square Massacre; c) efforts by academic institutions to curtail Chinese government threats to academic freedom; and 4) strategies collectively pursued by institutions to defend and promote academic freedom.”²³⁶
- “Join with other academic institutions to promote research in China. Academic institutions should work in concert, including by making public statements and complaints where appropriate, in the event of unwarranted visa denials or prolonged delays for research in China. Academic institutions should consider joint actions against Chinese government entities in response to visa denials or other obstacles to academic research.”²³⁷
- “Offer flexibility for scholars and students working on China. Ensure that a scholar’s career advancement or a student’s progress will not be compromised if their research has to change direction due to Chinese government restrictions on research or access to source material in China. Institutions should consider steps, such as granting the scholar or student extra time to finish their research, supporting alternative research strategies, or publishing using pseudonyms, in the face of Chinese government obstacles, harassment, or reprisals. Academic institutions should be open to alternative research strategies when funding or receiving funds for academic work that has been rejected by a Chinese entity. Funders and review boards should provide comparable flexibility.”²³⁸
- “Promote academic freedom of students and scholars from China. Inform students and scholars from China that they are not required to join any organizations, and help mentor and support them to ensure they can enjoy full academic freedom.”²³⁹
- “Ensure academic freedom in exchange programs and on satellite campuses. Exchange programs and satellite campuses in China should only be undertaken after the completion of a memorandum of understanding with the Chinese counterpart that has been transparently discussed by relevant faculty members and ensures the protection of academic freedom, including control over hiring and firing, and the curriculum.”²⁴⁰
- “Ensure that partners understand the UK institution’s commitment to academic freedom and freedom of speech and any potential implications this might have for the collaboration or partnership.”²⁴¹
- “In view of existing partnerships, how are decisions reached in cases where developments suggest that academic freedom can no longer be adequately guaranteed? Who should be involved in this decision? What steps are taken to deal with recurring problems?”²⁴²

²³⁶ Resisting Chinese Government Efforts to Undermine Academic Freedom Abroad. A Code of Conduct for Colleges, Universities, and Academic Institutions Worldwide, p. 3.

²³⁷ Resisting Chinese Government Efforts to Undermine Academic Freedom Abroad. A Code of Conduct for Colleges, Universities, and Academic Institutions Worldwide, p. 2.

²³⁸ Resisting Chinese Government Efforts to Undermine Academic Freedom Abroad. A Code of Conduct for Colleges, Universities, and Academic Institutions Worldwide, p. 2.

²³⁹ Resisting Chinese Government Efforts to Undermine Academic Freedom Abroad. A Code of Conduct for Colleges, Universities, and Academic Institutions Worldwide, p. 2.

²⁴⁰ Resisting Chinese Government Efforts to Undermine Academic Freedom Abroad. A Code of Conduct for Colleges, Universities, and Academic Institutions Worldwide, p. 3.

²⁴¹ Managing risks in internationalisation: security related issues, p. 20.

²⁴² Guiding questions on university cooperation with the People’s Republic of China, p. 10.

7 Research security

- “Build a categorization system for research areas based on how prone they are to risks like espionage or theft. Based on that system, different policies (e.g., on access or confidentiality) should apply. Identifying potential areas for dual use is already a common practice in most organizations and governments.”²⁴³
- “Restrict cooperation partners’ access to information in areas where information is prone to misuse (such as for dual use). Within research organizations in democracies, nationality should only be a criterion for access restrictions in areas that concern highly sensitive national security interests to protect against citizens of non-democracies being subjected to pressure from their governments to engage in spying activities. In other areas, it should not be individuals’ nationality but their previous and present affiliations that determine whether or not they will be granted access to information.”²⁴⁴
- “Formulate clear criteria for when access restrictions should apply so as to not endanger open science and data initiatives.”²⁴⁵
- “Prepare guidelines that are easy to use, such as “cheat sheets” and Q&As, to help cooperation practitioners internalize appropriate procedures and risk preparedness measures. One example is the German BAFA’s cheat sheet on risks related to dual use, but there is certainly room to provide even more user-friendly resources (e.g., in the form of interactive support and information websites). Limit additional regulations to the bare minimum and take into account that each new layer of provisions will add more red tape for those who have to implement them. Overly complicated or cumbersome rules and processes can quickly backfire.”²⁴⁶
- “Senior leaders should take measures to ensure that research staff and students understand and adhere to processes that safeguard IP during international partnerships, comply with export control legislation and promote the ethics and integrity of research and data management.”²⁴⁷
- “Can information on the applicable provisions pertaining to security-related research and relevant internal and external contact persons (...) be easily accessed by all those involved in research or research support? Are the actors participating in the cooperation aware of the applicable regulations in China in this context? Is information and training available for questions of security-related research?”²⁴⁸
- “Are there effective procedures in place to review regularly access to sensitive data and facilities by those who have access?”²⁴⁹
- “Does data management meet the required standards? Data collection, storage and access can entail a range of risks. This may be because the information is politically sensitive, because it has a certain strategic value, or because sharing information can be an issue for third parties. Unauthorised parties may attempt to gain access to such information via any number of entry points. Even sectors that do not seem terribly relevant in terms of content may still be targeted, not least because they often provide indirect access (‘a foot in the door’) to other, more relevant sectors. Besides these substantive matters, technical safeguards (e.g. for data encryption and access protocols) are also important in this connection.”²⁵⁰

²⁴³ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 37.

²⁴⁴ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 39.

²⁴⁵ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 39.

²⁴⁶ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 40.

²⁴⁷ Managing risks in internationalisation: security related issues, p. 41.

²⁴⁸ Guiding questions on university cooperation with the People’s Republic of China, p. 13.

²⁴⁹ Managing risks in internationalisation: security related issues, p. 55.

²⁵⁰ Checklist for Collaboration with Chinese Universities and Other Research Institutions, p. 11.

- “Invest in IT security to protect data, individuals’ or institutions’ research, and other sensible information from theft. Pay special attention to data and research activities in dual-use areas. Smaller organizations should receive support from their funders to increase their data security capabilities.”²⁵¹
- “Senior leaders should ensure that cybersecurity strategies are developed and implemented. In parallel, institutions should develop effective oversight and reporting protocols for cybersecurity risks, including threat modelling and intelligence-sharing with government and the sector (...).”²⁵²
- “Your institution will have a range of cybersecurity policies and procedures to manage access to software and hardware. However, as partnerships and collaborations come under greater scrutiny, it is likely that the frequency and sophistication of cyber-attacks will increase. You should ensure that your institution uses published threat assessments to anticipate likely cyber-threats (...).”²⁵³
- “You should pay particular attention to protecting information of specific value, which is likely to be subject to greater risk. This might include, for example, research with potential economic value, politically and commercially sensitive material, sensitive enterprise data or data on your staff and students.”²⁵⁴
- “Appropriate training is particularly important for researchers working on high-security issues, controlled technologies or other areas of research that are subject to export control legislation. Institutions should develop policies and training packages that highlight the need to segregate research materials and limit and monitor access to sensitive data and information. Such policies include:
 - segregation of sensitive research – separate out different areas of research so that data and information is not all held in one place, both physically and online
 - access control – only users and partners with a valid requirement have access to this data and networks, with two-step identity verification where possible
 - security of IT platforms – institutions should develop policies to ensure that staff and students understand the security of any collaborative IT platforms, especially those used by third parties
 - protection from extraterritorial jurisdiction issues – consider carefully the risks faced by academics and students participating in online discussions about issues that some nation states might regard as sensitive and take steps to inform these individuals.”²⁵⁵
- “You should regularly review your cybersecurity risk response processes and, if possible, share your findings with other institutions and the government where this would support the sector to better respond to future incidents. In addition to developing an evidence-base, this exchange of information will increase the collective capacity of institutions, the sector and government to respond.”²⁵⁶
- “Have internal university regulations and structures been established for handling questions of security-related research and export control, which exclude military use of civil research results and the transfer of sensitive, protected research technologies?”²⁵⁷
- “Electronic devices such as laptops and smartphones for use in China should be kept strictly separate from other equipment. You should also assume that all information stored on equipment or servers in China can be viewed by the Chinese government and intelligence services. Good cyber hygiene and customised security by design for your own IT infrastructure can reduce the impact and repercussions of incidents, for instance by compartmentalising access to information.”²⁵⁸

²⁵¹ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 39-40.

²⁵² Managing risks in internationalisation: security related issues, p. 35.

²⁵³ Managing risks in internationalisation: security related issues, p. 35.

²⁵⁴ Managing risks in internationalisation: security related issues, p. 35.

²⁵⁵ Managing risks in internationalisation: security related issues, p. 36.

²⁵⁶ Managing risks in internationalisation: security related issues, p. 36.

²⁵⁷ Guiding questions on university cooperation with the People’s Republic of China, p. 13.

²⁵⁸ Checklist for Collaboration with Chinese Universities and Other Research Institutions, p. 14.

- “Do not share personal information. This could be information collected during interviews (e.g., for studies or other research outputs) or information about staff. Personal information includes data such as ID, tax or passport numbers, bank account numbers, personal addresses, or information on family members.”²⁵⁹
- “Have principles and procedures been established for issues related to intellectual property protection? Can information on the applicable provisions and relevant internal and external contact persons be easily accessed by all those involved in research or research support? Is information and training available for corresponding questions?”²⁶⁰

7.1 Dual Use technology

- “While considering whether and to what extent it is concerned by dual-use export controls, a research organisation needs to conduct an initial risk assessment by examining the following parameters:
 1. The subjects of its activities (e.g., disciplines and research areas where it is active).
 2. The type and scope of these activities (e.g., field research, online and distance learning and amount of international collaborations and foreign participation involved in its activities).
 3. The current status of institutional policies and standardised procedures (e.g. type of organisation structure, existing mitigating measures for security risks and predominant attitudes of the staff).
 These parameters have to be assessed against legal obligations set in the EU and national export control laws. At the end of this initial risk assessment, a research organisation will be able to determine its specific dual-use risk profile. This will help the organisation to become aware of the parts of its research activities that need to be covered by the ICP (scope of its internal export compliance system) and target the ICP to the organisation’s specific circumstances (e.g., structure, institutional procedures and available resources).”²⁶¹
- “Develop in-house expertise on dual-use applications at large research funders, both public and private, to advise researchers and institutions.”²⁶²
- “Institutionalize risk assessments, security strategizing and internal compliance procedures by setting up ‘compliance desks’. (...) Depending on the organization and the corresponding risks involved in cooperating with counterparts from non-democracies, compliance desks need to be staffed with the right experts. For instance, research institutions working in the STEM fields should definitely have in-house experts on dual-use technologies. These compliance desks could also be responsible for updating security provisions and organizing staff trainings.”²⁶³
- “What strategies monitor the development of research in areas of potential high risk?”²⁶⁴
- “Identify research areas that are sensitive based on an analysis of the economic or security interests of the respective non-democratic government.”²⁶⁵
- “Limit restrictions on collaboration to those areas that pose an identified threat to national security. Any restrictions should be clearly articulated and targeted.”²⁶⁶
- “Consult others who were previously involved in similar cooperation projects and refer to incident trackers for information on potential problems that came up during

²⁵⁹ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 39.

²⁶⁰ Guiding questions on university cooperation with the People’s Republic of China, p. 13.

²⁶¹ EU compliance guidance for research involving dual-use items, p. 21.

²⁶² Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 37.

²⁶³ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 41.

²⁶⁴ Guidelines to counter foreign interference in the Australian university sector, p. 19.

²⁶⁵ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 37.

²⁶⁶ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 38.

cooperation. This should include looking into the leadership of individual organizations as well as screening different types of organizations from specific countries rather than only screening specific organizations."²⁶⁷

- "How do researchers reasonably consider the potential for their research to become dual-use?"²⁶⁸

7.2 Export control compliance

- "Develop a commitment statement stating that the scientific and administrative staff shall comply with all EU and national dual-use export control laws and regulations by applying the mitigating measures foreseen in the organisation's policies and procedures."²⁶⁹
- "Clearly and regularly communicate the commitment statement to all potentially concerned staff (also staff with no role in dual-use export control) in order to raise awareness and promote a culture of compliance with the dual-use export control laws and regulations."²⁷⁰
- "Consider using all available means (either electronic or print-outs) to publicise the statement and sources of information about the internal compliance procedures of the organization."²⁷¹
- "Determine which parts of your organisation are relevant for export control compliance. Identify and appoint the person(s) with the overall responsibility and attribute at least one person to the export compliance function. Depending on the organisation's needs this person may only have to handle tasks relating to dual-use export control on a part-time basis."²⁷²
- "What strategies are in place to ensure compliance with (...) relevant legislative frameworks?"²⁷³
- "Consider all different types of responsibility and compliance related functions. Define clear processes and responsibilities for both administrative and scientific staff. Start by the departments conducting research in a critical area and expand to address other less sensitive departments as your compliance system evolves. Do not overlook to define the delegation of powers (e.g. in case of sickness or holidays) and back-up functions whenever possible."²⁷⁴
- "Ensure that appropriate resources are allocated to the ICP [internal compliance programme] and consider the knowledge and skillset needed in terms of both legal and technical expertise. Written job descriptions are recommended."²⁷⁵
- "Be ready to fully exploit expertise and experience already available in different parts of the organisation. Consult with colleagues of different departments (e.g., procurement, security and legal department) on the ways that available policies and procedures could accommodate export compliance requirements. Consider setting up - along with your IT support - online tools and procedures to facilitate the implementation of internal compliance measures."²⁷⁶
- "Codify the organisation's export compliance policies and procedures including the main chain of responsibility in manuals/handbooks and make them available to the organisation online or in hard copy. Try to use language that is as precise and clear as

²⁶⁷ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 38.

²⁶⁸ Guidelines to counter foreign interference in the Australian university sector, p. 18.

²⁶⁹ EU compliance guidance for research involving dual-use items, p. 23.

²⁷⁰ EU compliance guidance for research involving dual-use items, p. 23.

²⁷¹ EU compliance guidance for research involving dual-use items, p. 23.

²⁷² EU compliance guidance for research involving dual-use items, p. 25.

²⁷³ Guidelines to counter foreign interference in the Australian university sector, p. 18.

²⁷⁴ EU compliance guidance for research involving dual-use items, p. 25.

²⁷⁵ EU compliance guidance for research involving dual-use items, p. 26.

²⁷⁶ EU compliance guidance for research involving dual-use items, p. 26.

possible. Consider including examples and practical cases such as the ones offered in this guidance or in national sources."²⁷⁷

- "Make sure that the scientific and administrative staff knows what procedure to follow and who is the contact point whenever an export control question arises."²⁷⁸
- "To maximise compliance with export control legislation, individuals should:
 - consider potential end-use possibilities of technology: it is the duty of researchers and their institutions to monitor potential end-uses of research, throughout the research life cycle. In some cases, research will have end-use applications that are unidentifiable in the early stages of development and continued monitoring is required
 - inform researchers about the implications of intangible technology transfer: researchers must be aware that controlled sensitive information transmitted electronically (eg via social media, fax and email, videoconferencing, sharing screens remotely) and verbally (eg in telephone and face-to-face discussions) may still be subject to export controls."²⁷⁹
- "Provide compulsory, periodic training for all staff potentially involved in export controlled dual-use activities in order to raise awareness of export control issues and infuse a culture of responsibility throughout the organisation."²⁸⁰
- "When possible, use existing training initiatives such as introductory courses for newly recruited staff to incorporate references to export compliance measures and requirements. Follow the same approach with staff regulations and didactic material being already in use."²⁸¹
- "Ensure via awareness raising tools (e.g., decision trees, intranet webpages, information and acknowledgement notes in export control relevant procedures) that all concerned staffs are aware of all internal policies and measures on export controls. Make use of material containing information on relevant EU dual-use export control laws and control lists and restrictive measures, as well as national measures and embargoes. Consider making user-friendly tools (developed in-house or provided by external resources) available to all concerned staff to facilitate easy navigation through these legal documents and their updates. If possible, consider customised trainings for both administrative and scientific staff."²⁸²
- "Consider, whenever appropriate, to make use of opportunities to receive national or EU training for dual-use export controls."²⁸³
- "Incorporate lessons learnt from performance reviews, audits, reporting and corrective actions, whenever possible, in your training or export awareness programmes. Conversely, take note of any findings alluding to an insufficient functioning of the compliance measures in place."²⁸⁴
- "Try to determine whether an envisaged project will use controlled items and examine whether its contributions will meet the thresholds specified in the control list. For projects identified as of high risk, provide for export screening checks throughout the life cycle of the project."²⁸⁵
- "Pay particular attention to the classification of dual-use components and spare parts, and to the classification of dual-use software and technology that can be transferred by e-mail or made available via a 'cloud' service abroad."²⁸⁶

²⁷⁷ EU compliance guidance for research involving dual-use items, p. 26.

²⁷⁸ EU compliance guidance for research involving dual-use items, p. 26.

²⁷⁹ Managing risks in internationalisation: security related issues, p. 42.

²⁸⁰ EU compliance guidance for research involving dual-use items, p. 27.

²⁸¹ EU compliance guidance for research involving dual-use items, p. 28.

²⁸² EU compliance guidance for research involving dual-use items, p. 28.

²⁸³ EU compliance guidance for research involving dual-use items, p. 28.

²⁸⁴ EU compliance guidance for research involving dual-use items, p. 28.

²⁸⁵ EU compliance guidance for research involving dual-use items, p. 32.

²⁸⁶ EU compliance guidance for research involving dual-use items, p. 32.

- "As a precautionary measure, consider verifying whether dual-use items falling within the scope of the control lists exist in the laboratories and repositories of the organisation. Their presence can be an indicator of export control sensitivities. Examine the possibility to register in your inventories whether an item (either new, used or spare) is of dual-use relevance, and thus requires special handling in case of export."²⁸⁷
- "Consult with the project leaders and available experts in order to collect information about the possible misuse of your dual-use items in the context of conventional military weapons or WMDs."²⁸⁸
- "While collaborating with companies or other research organisations, it is a good practice to request additional information about the technical parameters and the control status and classification of materials, components, subsystems that are to be used by your organisation from them."²⁸⁹
- "As required by Article 22(10) of the EU dual-use regulation concerning intra-EU transfers, mention in the relevant documents (contract, order confirmation, invoice or dispatch note) that the transaction involves listed dual-use items and are subject to controls if exported from the EU."²⁹⁰
- "Set up export screening procedures allowing your organisation to perform a risk assessment that addresses all different potentially sensitive activities and sources of risk. These procedures shall enable individual researchers, students, project leaders and administrative staff to contribute to the assessment of the export control risks relating to the organisation's activities."²⁹¹
- "Where possible, adjust your institutional policies and procedures to accommodate export control checks for potentially sensitive activities (shipping, contracting, publishing, sharing online etc.) and, allow for mitigating measures concerning projects flagged as sensitive."²⁹²
- "Consider using generic risk assessment tools (e.g. flow charts) as well as data mining technics and other software for screening items, projects and linked activities against export control lists and lists of restricted entities and destinations."²⁹³
- "The result of the item classification and risk assessment of the activity might be that a licence requirement is relevant. Gather and disseminate information about the range of license types (including individual, global and general licenses) and controlled operations (export, brokering, transfer and transit), and about the license application procedures relating to the applicable EU and national dual-use export controls. Be aware of national dual-use export control measures for other activities, such as technical assistance."²⁹⁴
- "Consider to make use of simplified licence procedures (general licenses) for destinations mentioned in the EU dual-use Regulation or national measures."²⁹⁵
- "Ensure that all concerned staff knows about the different types of licences and procedures to be followed internally and for submission to the authority (who will be able to apply and what steps to follow)."²⁹⁶
- "Ensure, according to the research organisation's risk assessment, that controlled dual-use items are secured against unauthorised removal, access or use by all staff including students, visiting scientific staff and external collaborators. Measures to be considered

²⁸⁷ EU compliance guidance for research involving dual-use items, p. 32-33.

²⁸⁸ EU compliance guidance for research involving dual-use items, p. 33.

²⁸⁹ EU compliance guidance for research involving dual-use items, p. 33.

²⁹⁰ EU compliance guidance for research involving dual-use items, p. 33.

²⁹¹ EU compliance guidance for research involving dual-use items, p. 31.

²⁹² EU compliance guidance for research involving dual-use items, p. 31.

²⁹³ EU compliance guidance for research involving dual-use items, p. 32.

²⁹⁴ EU compliance guidance for research involving dual-use items, p. 35.

²⁹⁵ EU compliance guidance for research involving dual-use items, p. 35.

²⁹⁶ EU compliance guidance for research involving dual-use items, p. 35.

include, for example, physically safeguarding the items, the establishment of restricted access areas and personnel access or exit controls."²⁹⁷

- "Establish internal policies and procedures for secured storage of and access to controlled dual-use software or technology in electronic form, including antivirus checks, file encryption, audit trails and logs, user access control and firewall."²⁹⁸
- "In the case of handling export controlled information in the context of an international collaboration make sure that the necessary precautions are applied also by the organisation's partners. Such a requirement could be specifically included in the agreement/contract setting up the collaboration."²⁹⁹
- "Consider using classification schemes (e.g. markings) when transmitting software and technology containing sensitive or export controlled information."³⁰⁰
- "If applicable to your organisation, consider protective measures such as end to end encryption for uploading software or technology to the 'cloud', storing it in the 'cloud' or transmitting it via the 'cloud'. "³⁰¹
- "Ensure that none of the parties involved in a project or sensitive activity are subject to restrictive measures (including sanctions) by consulting the EU consolidated list of sanctions or national list."³⁰²
- "Know your partner(s) and consider how they intend to use your research involving dual-use items."³⁰³
- "Be aware of the existence of research organisations acting as cover for military research or having strong ties with state-owned entities."³⁰⁴
- "Ask for an end-use statement if the activity involves listed dual-use items and when there are end-use(r) concerns in case of non-listed dual-use items. Consult the information provided by your competent authority for national rules and requirements concerning end-use statements. Please be aware that end-use statements can be requested also for sharing controlled software and technology."³⁰⁵
- "Be vigilant for diversion risk indicators and signs about suspicious enquiries or orders."³⁰⁶
- "Be vigilant for diversion risk indicators and signs about suspicious enquiries for cooperation. There might be indications suggesting that a partner will use dual-use items shared or delivered by your organisation in the context of unauthorised military research or, in relation to WMDs and their means of delivery or, other unlawful purposes."³⁰⁷
- "Please take into account that also non-listed dual-use items might require an export authorisation, if the stated end-use and involved parties screening or the diversion risk screening raises some concern in the sense of the catch-all provisions, in Article 4 of Council Regulation (EC) No 428/2009. Usually, this situation may concern items having technical parameters close to the controlled ones."³⁰⁸
- "The export screening process should assess the possibility for a non-listed dual-use item to be used in connection to sensitive end-uses specified under Article 4 of the EU dual-use Regulation. If the researcher or research organisation is aware or suspects that an activity or project entails such a risk, it must abstain from engaging further to

²⁹⁷ EU compliance guidance for research involving dual-use items, p. 39.

²⁹⁸ EU compliance guidance for research involving dual-use items, p. 39.

²⁹⁹ EU compliance guidance for research involving dual-use items, p. 39-40.

³⁰⁰ EU compliance guidance for research involving dual-use items, p. 40.

³⁰¹ EU compliance guidance for research involving dual-use items, p. 40.

³⁰² EU compliance guidance for research involving dual-use items, p. 33.

³⁰³ EU compliance guidance for research involving dual-use items, p. 33.

³⁰⁴ EU compliance guidance for research involving dual-use items, p. 33.

³⁰⁵ EU compliance guidance for research involving dual-use items, p. 34.

³⁰⁶ EU compliance guidance for research involving dual-use items, p. 34.

³⁰⁷ EU compliance guidance for research involving dual-use items, p. 34.

³⁰⁸ EU compliance guidance for research involving dual-use items, p. 34.

this research and immediately inform the competent authorities who will conclude whether a license application is necessary."³⁰⁹

- "Before the actual shipment or transmission of a controlled item, there should be a final check if all steps regarding compliance were taken. This is a good moment to double check if items are correctly classified, if red flags have been checked, if the screening of entities was done and whether there is a valid licence for the shipment. Be aware that a change of relevant legislation could have taken place in the meantime. For example: the item is now a listed dual-use item or the end-user is now sanctioned."³¹⁰
- "Ensure that the terms and conditions of the licence have been complied with (including reporting). Please be aware that a licence may restrict the transfer of technology and software to only certain recipients and consider how partners involved in a sensitive research observe such requirements."³¹¹
- "Be aware that any changes to the organisation's details (such as name, address and legal status), to the details of the end-user and/or intermediaries and to the details of the authorised items may affect the validity of your license."³¹²
- "Provide for control mechanisms as part of the regular operations to monitor the workflow within the organisation to ensure that any wrong doings are detected in an early stage. For example, one approach is to use the four eyes principle for a technical classification or export screening result. Consider the roles of both administrative staff and researchers in the process of monitoring."³¹³
- "Develop and perform audits to check the design, adequacy and efficiency of the ICP. Make sure to include all elements of the ICP into the audit."³¹⁴
- "Ensure that all staff, including students, feel confident and reassured when they raise questions or report concerns about compliance in good faith."³¹⁵
- "Establish whistleblowing and escalation procedures to govern the actions of staff when a suspected or known incident of non-compliance has occurred."³¹⁶
- "Document any suspected breaches of national and EU dual-use export control legislation and the associated corrective measures in writing."³¹⁷
- "Take corrective actions to adapt the export control operations or the ICP according to the findings of the performance review, the ICP system audit or the reporting. It is recommended to share these findings, including the revision to procedures and corrective actions with all staff concerned and the top-management. Once the corrective actions have been implemented, it is recommended to adapt the policies and procedures of the ICP as necessary and communicate the changes within the organisation."³¹⁸
- "A dialogue with your competent authority can contribute to damage control and possible ways to strengthen the research organisation's export control system."³¹⁹
- "Verify the legal requirements for recordkeeping (period of safekeeping, scope of documents, etc.) in the national legislation of the EU Member State where the organisation is established. In order to make sure that all relevant documentation is at hand, consider determining the record retention requirements in the contracts with collaborators. Create an adequate filing and retrieval system for the dual-use export control. Electronic systems with performant indexing and search functionalities are essential. Ensure that export control related documents are maintained in a consistent

³⁰⁹ EU compliance guidance for research involving dual-use items, p. 34.

³¹⁰ EU compliance guidance for research involving dual-use items, p. 35.

³¹¹ EU compliance guidance for research involving dual-use items, p. 35.

³¹² EU compliance guidance for research involving dual-use items, p. 35.

³¹³ EU compliance guidance for research involving dual-use items, p. 36.

³¹⁴ EU compliance guidance for research involving dual-use items, p. 36.

³¹⁵ EU compliance guidance for research involving dual-use items, p. 37.

³¹⁶ EU compliance guidance for research involving dual-use items, p. 37.

³¹⁷ EU compliance guidance for research involving dual-use items, p. 37.

³¹⁸ EU compliance guidance for research involving dual-use items, p. 37.

³¹⁹ EU compliance guidance for research involving dual-use items, p. 37.

manner and can be made available promptly to your government or other external parties for inspections or audits. It is recommended to keep a record of past contacts with the competent authority, also in relation with end-use(r) controls for non-listed dual-use items and in case of technical classification advices.³²⁰

8 Knowledge sharing

- “How does your university collaborate and share information across the sector?”³²¹
- “Establish and/or strengthen multilateral and international platforms for dialogue and exchange through financial and/or political support. These institutions facilitate the development of new cooperation regimes, but they can also set norms by establishing codes of conduct, treaties, memoranda of understanding, and other contractual formats that eventually shape what constitutes good practice in the respective realms of collaboration. In addition, they facilitate knowledge sharing and dissemination activities. These platforms should include (semi-)permanent formats that allow (non-)governmental security experts, university leaders and other stakeholders affected by the risks of cooperation to come together to exchange experiences.”³²²
- “Create, support and/or participate in permanent exchange fora where organizations involved in cooperation activities can share and discuss experiences. This could, for example, include experiences with authoritarian influence tactics and propaganda activities.”³²³
- “Share, standardize, codify, and disseminate best practices. Different countries, business sectors and research institutes should engage in frequent discussions and share information as well as experiences. Moreover, they should jointly raise awareness about non-democratic practices such as disinformation campaigns.”³²⁴
- “Make guidelines, best practices and results of internal reflection processes publicly available. Internal resources that are only circulated in the respective organizational circles may be a first step, but they do not enable public oversight of the organizations in question, nor do they allow for scrutiny of the extent to which organizations have learned from previous misjudgments. Not only is public access to information a way to showcase integrity by demonstrating openness to public scrutiny, but it promotes the overall endeavor to aggregate best practices.”³²⁵
- “Regularly review and adjust guidelines and security procedures to ensure that they remain up to date. Ideally, organizations should do so every time they enter into a new and/or bigger international cooperation project with a partner or partners from non-democratic contexts.”³²⁶
- “Do staff have ready access to information on potential partners that have engaged with the university in the past?”³²⁷
- “How are experiences shared to help others and what opportunities are there to provide feedback and share lessons learned?”³²⁸
- “How does your university collaborate and share information with government?”³²⁹
- “Commission regular external reviews of the organization. These can either be conducted by specialized evaluators or by other organizations with similar value

³²⁰ EU compliance guidance for research involving dual-use items, p. 38.

³²¹ Guidelines to counter foreign interference in the Australian university sector, p. 22.

³²² Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 51.

³²³ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 51.

³²⁴ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 51.

³²⁵ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 51.

³²⁶ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 40.

³²⁷ Guidelines to counter foreign interference in the Australian university sector, p. 22.

³²⁸ Guidelines to counter foreign interference in the Australian university sector, p. 22.

³²⁹ Guidelines to counter foreign interference in the Australian university sector, p. 23.

statements through peer review networks. When handled on the basis of reciprocity between participating organizations (and thus free of charge), the latter could be especially fitting for smaller organizations with limited budgets."³³⁰

9 Additional resources

- "What information or advice is available from Government?"³³¹
- "What additional resources and support are available to provide ongoing due diligence on high-risk international research partnerships?"³³²

10 Other points from the quoted guidelines for further discussion

- "Support a pro-democratic, 'watchdog' civil society in liberal democracies to build the structures that are necessary for a functioning domestic culture of scrutiny and monitoring of institutions that are too close to or too dependent on authoritarian funding (or other forms of influence)."³³³
- "Reject Confucius Institutes. Refrain from having Confucius Institutes on campuses, as they are fundamentally incompatible with a robust commitment to academic freedom. Confucius Institutes are extensions of the Chinese government that censor certain topics and perspectives in course materials on political grounds, and use hiring practices that take political loyalty into consideration."³³⁴
- "Provide flexible project guidelines that enable organizations to spend money more creatively, try out new formats and better react to unforeseen circumstances."³³⁵
- "Form alliances between funders who are committed to the principles of liberal democracy. When clearly fostering integrity, such alliances can act as a more visible source of potential funding for value-based cooperation projects. At the same time, stronger cooperation between funding organizations and a pooling of resources could enable funding for bigger, more ambitious projects. Such projects could aim at, for instance, building certain research infrastructures that are currently lacking in certain democratic countries. This way, organizations involved in research cooperation do not depend as much on access to infrastructures in non-democratic contexts."³³⁶
- "Publicly stand in for and pursue your values, including freedoms and rights for research, dialogue and civil society. This should include promoting counternarratives to those propagated by non-democratic governments."³³⁷
- "Publicly commit to core values such as academic freedom or freedom of expression and do so starting at the highest institutional levels. Provide high-level visible support for like-minded individuals and organizations when they are under pressure."³³⁸
- "Directly and publicly name and condemn authoritarian practices where they affect your staff or your organization as a whole and stand in solidarity with peers. Organizations in liberal democracies should not only recognize but also publicly name threats to their

³³⁰ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 45.

³³¹ Guidelines to counter foreign interference in the Australian university sector, p. 19.

³³² Managing risks in internationalisation: security related issues, p. 56.

³³³ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 45.

³³⁴ Resisting Chinese Government Efforts to Undermine Academic Freedom Abroad. A Code of Conduct for Colleges, Universities, and Academic Institutions Worldwide, p. 2.

³³⁵ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 46.

³³⁶ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 46.

³³⁷ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 47.

³³⁸ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 47.

values and do so at the highest institutional levels. Organizations that aim to be diplomatic often fall back onto euphemisms when talking about serious human rights violations and atrocities. But anything short of clearly seeing and naming such abuses for what they are comes close to complicity. It also aids authoritarian governments in their efforts to reframe narratives about their repressive actions or blame the victims of their oppression."³³⁹

- "Formulate clear rules (such as codes of conducts) for properly approaching interactions with entities from non-democracies before entering into any type of cooperation contract."³⁴⁰
- "Provide moral and, if possible, financial support to monitoring bodies or organizations that work to expose and counter human rights violations and atrocities. Such organizations play an important role in public naming and shaming and are often involved in efforts to document violations for when national or international prosecution becomes possible."³⁴¹
- "Design mandatory introductory courses aimed at fostering critical and independent thinking, especially for study programs with typically high numbers of students from non-democracies. Universities in liberal democracies with students from non-democracies should help these students (and their other students) develop their critical thinking skills and teach the value of fundamental freedoms such as freedom of speech and academic freedom – ideally not only as abstract concepts, but as lived experiences. Such courses should be a mix of philosophy of science and applicable knowledge about research integrity practices. Every student, but especially those in the STEM fields that often lack these types of courses, would benefit from such dedicated spaces for critical reflection on the nature and conditions of independent science. Such courses promise to be particularly rich if students come from a variety of different political systems. This would force students to engage with each other and work through their differences in an orderly, constructive manner. It would also provide for an intellectual as well as an intercultural exchange. While many universities offer courses in that direction, these are often optional. Making them a mandatory part of students' education would not only ensure that all students have this experience at least once, but it would also signal that universities and schools regard those topics and questions as a fundamental part of their respective academic discipline."³⁴²
- "Draft targeted policies by focusing on specific, egregious forms of behavior or affiliations rather than on identity markers such as ethnicity or nationality."³⁴³
- "Support like-minded CSOs in non-democracies through long-term financial engagement. Funding organizations should keep in mind that independent CSOs in non-democracies are often targets of government-sponsored harassment and debilitating legislation that usually results in higher costs, for instance for legal fees. In addition, independent CSOs in non-democratic contexts are often dependent on funds from liberal democratic countries. In the Turkish academic sphere, for example, many projects are financed through the EU's Horizon 2020 scheme, including the Future of EU-Turkey Relations (FEUTURE) project, or through Erasmus+ schemes such as VIADUCT. However, many donors only provide short-term funds on a project basis while it is actually the more long-term and flexible funding commitments that would help CSOs in non-democracies adapt to and cope with the volatility of corrupted legal systems and repression."³⁴⁴
- "Expand engagement with like-minded partners that contest the status quo and confront strategic narratives of their non-democratic governments. Just as engagement

³³⁹ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 48.

³⁴⁰ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 41.

³⁴¹ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 48.

³⁴² Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 48-49.

³⁴³ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 49.

³⁴⁴ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 49-50.

with organizations that are close to or even associated with non-democratic governments provides legitimacy for the institutional networks of autocracies, engagement with alternative actors that work against such narratives provides them with legitimacy.”³⁴⁵

- “Maintain established channels and exercise caution when establishing new ones if the situation on the ground deteriorates. Long-standing cooperation channels should be maintained and kept alive even when the situation in a nondemocratic country deteriorates, as was the case in Turkey. These networks already come with a history and strong interpersonal relationships make it easier to strike the right balance between amicable and constructive cooperation on the one hand and maintaining one’s integrity by clearly speaking up and pushing back against repression and authoritarian practices on the other hand. At the same time, rapidly deteriorating political situations and especially a rise in infringements of human rights and fundamental freedoms warrant special caution when it comes to engaging in any new cooperation projects.”³⁴⁶
- “Are there concerns that the scientific independence of university members participating in a partnership has been restricted?”³⁴⁷
- “Has the academic freedom of the (...) students, teaching staff and researchers participating in the cooperation been predictably guaranteed?”³⁴⁸
- “Does the partner or the backing entity appear on any public registers (...) and – to the extent that it is reasonable for the university to be able to determine – is the partner being upfront and transparent about their affiliations, parent partners and intent?”³⁴⁹
- “Does the research activity proposed involve items or goods listed on the Defence Strategic Goods List? Are the proposed research activities captured by the DTCA?”³⁵⁰
- “Does the activity or partnership proposed need to be registered under the Foreign Influence Transparency Scheme?”³⁵¹
- “Are you aware that there is a specific/heightened risk:
 - o in using particular IT applications in China and social media of Chinese origin (e.g. WeChat) when communicating with Chinese people?
 - o in allowing Chinese students and researchers to access (...) university networks?
 - o inherent in Dutch-society, with its openness, freedom of communication and relatively limited degree of compartmentalisation, which makes it relatively easy for outsiders to gain access to a critically important sector by an indirect route – in other words via a different, seemingly less related sector?”³⁵²
- “Are you aware that long-term relations and financial dependence on Chinese funding sources increase vulnerability?”³⁵³

³⁴⁵ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 50.

³⁴⁶ Risky Business. Rethinking Research Cooperation and Exchange with Non-Democracies, p. 50.

³⁴⁷ Guiding questions on university cooperation with the People’s Republic of China, p. 10.

³⁴⁸ Guiding questions on university cooperation with the People’s Republic of China, p. 10.

³⁴⁹ Guidelines to counter foreign interference in the Australian university sector, p. 15.

³⁵⁰ Guidelines to counter foreign interference in the Australian university sector, p. 15.

³⁵¹ Guidelines to counter foreign interference in the Australian university sector, p. 15.

³⁵² Checklist for Collaboration with Chinese Universities and Other Research Institutions, p. 15.

³⁵³ Checklist for Collaboration with Chinese Universities and Other Research Institutions, p. 15.