

SANCTIONS ASSESSMENT SEARCH GUIDE

This guide provides instructions for Griffith staff who conduct ‘activities assessments’ as part of an overall sanctions assessment.

Activities assessments determine whether an activity an individual will undertake involves any goods, technology, or the provision of any services (including training), that may be subject to restrictions under one of Australia’s sanctions regimes ([Sanctions Regimes](#)).

If the individual’s research project involves sanctioned goods or services, it may be necessary to restrict their involvement in the activity or, in some cases, prevent them from undertaking the activity (for more information see the Griffith Sanctions Compliance page) ([GU Export Trade Controls](#)).

Staff, Adjuncts or HDR applicants who have a connection to a country or region subject to sanctions against the country or region will generally require an activities assessment.

It is the HDR supervisor’s responsibility to identify or seek advice regarding items involved in the research that may be sanctioned under Australian sanctions regimes. This requires careful consideration of the range of items involved including data access, systems, equipment, materials, software, technology, and finished goods.

If in doubt, please contact the Export Control and Security Manager in the Office for Research for advice and/or guidance.

Identifying Sanctioned Goods

The types of goods that are sanctioned under Australian sanctions law vary widely and are specific to the objectives of the applicable sanction’s regime ([Sanctions Regimes](#)).

Many of Australia’s sanctions regimes include restrictions or prohibitions related to arms or related material. These are sometimes referred to as arms embargoes and includes items specifically designed for military use and ‘dual use’ goods that are designed for civilian use but may also have a military application. Several of Australia’s sanctions regimes (Iran, Syria, Iraq, North Korea, and Ukraine Regions) include sanctions on goods that may not necessarily relate to military use. Each of these sanctions regimes is underpinned by one or more pieces of legislation that determines the items that are sanctioned.

If an activities assessment is required in relation to one of these sanctions’ regimes, relevant legislation needs to be considered to determine whether the activity involves sanctioned items.

As an example, for assessment of activity by an individual with connections to Iran view the Charter of the United Nations (Sanctions – Iran) (Export Sanctioned Goods) List Determination 2016 and the Autonomous Sanctions (Export and Import Sanctioned Goods – Iran) Amendment Specification 2016).

Describing Research Activities

It is a requirement to describe the research activity that will be undertaken by either a HDR Applicant, Adjunct or international collaborator as part of their project. Details of all goods, equipment, materials, technology, and software the research involves, whether you think they may be sanctioned or not must be provided. The Export Control and Security manager will use this information to ensure all items of concern have been identified as part of the assessment.

Describing Items of Concern

You are required to identify items that may be considered arms or arms related materiel under Australian sanctions law and, if any items are identified, describe those items as follows.

Items on the Defence and Strategic Goods List ([DSGL](#))

For items that you believe are captured by the DSGL, you must provide the DSGL item number and an explanation of why you believe the item is captured by the DSGL. You must also indicate items that matched your search terms, but you consider can be excluded based on the technical thresholds in the DSGL. For these items you must provide the DSGL item number and an explanation of why you believe the item is not a match. The PDF of the results returned by the DSGL search tool, both for items that are captured by the DSGL and those you believe can be excluded based on technical thresholds can be forwarded to the Export Control and Security Manager for review.

Non-DSGL items that may be arms or related materiel.

For items not on the DSGL that you believe may be arms or arms related materiel (that is, they could have intrinsic military utility), you must provide: detailed description, including technical specifications, for the item, explanation as to why you believe the item may be arms or arms related materiel (why do you believe it has intrinsic military utility), details of the intended end use of the item, and details of who the end user of the item will be.

Changes to Research Activity

A recommendation to admit a student to the HDR program is based on the circumstances at the time of the original activities assessment. If a student is from a sanctioned country, it is strongly advised to avoid any changes to the research topic. The HDR supervisor must notify GGRS as soon as possible if there is a proposal to change the research topic for international students that are not from sanctioned countries, as a new Sanctions Compliance Risk Assessment Form (SCRAF) will be required.

Failure to report changes to an activity may result in a breach of sanctions law, which carries significant penalties for individuals and the university.

Group Dean Research

The Group Dean Research's role is to review the HDR supervisors' assessment or Adjunct appointment and then provide a recommendation on whether the activity raises any concerns under Australian sanctions law. With respect to HDR Applicants the information provided on the SCRAF, including the results of any DSGL searches, should be reviewed, and assessed as follows:

- (i) The HDR supervisor has shown due diligence in assessing the activity using the SCRAF and associated assessment guides for Sanctions and the DSGL.
- (ii) The assessment considers all relevant aspects of the activity.
- (iii) Sufficient details have been provided to allow the HDR Convenor and Export Control and Security Manager to understand the key elements of the activity, items of concern, and the applicant's involvement with the item and searches of the DSGL are appropriate, including the right selection of search terms.
- (iv) If the assessment does not meet these conditions, the Group Dean Research will send it back to the supervisor with details of what needs addressing and/or specific questions. The HDR supervisor may contact the Export Control and Security Manager for assistance.
- (v) When the supervisor's assessment is complete the Group Dean Research will sign the SCRAF (page 6) certifying that the assessment of the proposal has or has not identified items that may be restricted or prohibited under Australian sanctions law. The Group Dean Research may convene, form, and Chair a Group HDR Sanctions Assessment Panel, comprised of designees selected by the Group Dean Research. If an item has been identified, for example an item in the proposal is listed on the DSGL, then the option 'raises some concerns' is the appropriate selection. Where an item has not been identified, including items excluded due to technical thresholds, the 'do not raise any concerns' is the appropriate selection.
- (vi) The signed SCRAF including a recommendation is to be forwarded to the Dean GGRS for review.
- (vii) The Dean GGRS will conduct a review of the activities assessment using the information provided in the SCRAF and make a recommendation as to whether the HDR Applicant should be made an offer, or the matter should be referred to the Group HDR Sanctions Assessment Panel for further review.