SANCTIONS COMPLIANCE RISK ASSESSMENT FORM (SCRAF)

## HIGHER DEGREE BY RESEARCH PROGRAMS

|  |
| --- |
| Instructions for use |
| This form is to be completed as indicated below and as outlined in the [Managing Assessment of HDR Applicants: Sanction and Export Controls Compliance Procedure](https://sharepointpubstor.blob.core.windows.net/policylibrary-prod/Managing%20Assessment%20of%20HDR%20Applicants%20Sanctions%20and%20Export%20Controls%20Compliance%20Procedure.pdf), and used to assess the sanctions risk to Griffith for Applicants to higher degree by research (HDR) programs. It applies to Masters by Research and Doctoral programs.  In accordance with sanctions law requirements, HDR Applicants are identified for a sanctions assessment based on their connection to a sanctioned country or their intention to conduct research in or with a sanctioned country. Primarily this is based on the Applicant’s citizenship(s). Applicants who are Australian citizens, permanent residents or holders of Australian humanitarian visas do not require assessment.  The type of sanctions assessment required, and therefore which sections of this form to complete, will depend on the applicable [sanctions regime](https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes). Refer to the table below for instructions, as well as the [Sanctions Assessment search guide](https://www.griffith.edu.au/__data/assets/pdf_file/0031/1846651/Griffith-Sanctions-Assessment-Search-Guide.pdf).  **NOTE:** Sanctions law is subject to change by the Australian government. Please do not store local copies of sanctions assessment guides, policies, forms or lists as they will be updated regularly to reflect changes. You can access the most recent version on the [Sanctions Compliance page](https://www.griffith.edu.au/research/research-services/research-policy-performance/export-trade-controls). |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Sanctions regime** | | **Sections to complete** | **Documents required** | **Instructions** |
| DFAT consolidated list check only | * Former Yugoslavia (*Bosnia-Herzegovina, Croatia, Macedonia, Montenegro, Serbia, Slovenia, Vojvodina, Kosovo*) * Guinea-Bissau * Mali * Ukraine (not Ukraine Regions) * Yemen | 1 | Curriculum Vitae | * **GGRS** - completes Section 1 of this form and checks the applicant and associated entities against DFAT’s Consolidated List. If no match, the admission process may proceed. If there is a match, contact the Export Control and Security Manager: [exportcontrol@griffith.edu.au](mailto:exportcontrol@griffith.edu.au). |
| DFAT consolidated list check and assessment of teaching and research activities (directly or indirectly related to the proposal, and exposure to technologies and materials within the work environment should be considered). | | | | |
| Arms or related materiel and (if applicable) military activities sanctions only | * Central African Republic * DR Congo * Lebanon * Libya * Myanmar * Somalia * Sudan * South Sudan * Zimbabwe | 1, 2, 3, 4 | Curriculum Vitae  Research Proposal | * **GGRS** - completes Section 1, checks the applicant and associated entities against DFAT’s Consolidated List, and attaches the form to the application. * **HDR Convenor and Principal HDR Supervisor** – HDR Convenor arranges for the Supervisor to complete Sections 2 and (if applicable) 3, and signs Section 4.1, then emails to the HDR Convenor who forwards to the Group Dean Research, concurrently with the online application recommendation. * **Group Dean Research** - reviews the form and makes a recommendation in Section 4.3, then emails to the Dean GGRS at ggrs-dean@griffith.edu.au. * **Dean GGRS** – reviews the assessment and makes a recommendation regarding the offer of candidature at Section 4.4, and attaches the completed form to the application. |
| Country specific sanctions only | * Ukraine (Ukraine Regions) | 1, 2 |
| Arms or related materiel and country specific sanctions | * DPRK (North Korea) * Iran * Iraq * Russia * Syria | 1, 2, 3, 4  1, 2, 3, 4  1, 2, 3,4  1, 2, 3, 4  1, 2, 3**,** 4 |

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| SECTION 1: APPLICANT AND PROGRAM DETAILS *(all countries)* | | | | | | | | | | | | | | | |
| *Completed by GGRS* | | | | | | | | | | | | | | | |
| 1.1 Applicant details | | | | | | | | | | | | | | | |
| **Family name:** | Click or tap here to enter text. | | | **Given names:** | Click or tap here to enter text. | | | | | | **Title (Mr, Ms, etc):** | | | | Click or tap here to enter text. |
| **Applicant number:** | | | Click or tap here to enter text. | | | | | | | | | | | | |
| **Other names known by (if applicable):** | | | Click or tap here to enter text. | | | | | | | | | | | | |
| **Citizenship(s) – *list all citizenships, current and previous:*** | | | Click or tap here to enter text. | | | | | | | | | | | | |
| **Country of birth:** | | | Click or tap here to enter text. | | | | | | | | | | | | |
| **Does the applicant hold an Australian visa?** | | | | | |  | Yes |  | No | | |  | | N/A - Australian citizen | |
|  | Information not available | | | | | | | | |
| **Does the applicant receive financial support from an institution/government located in a sanctioned country?** | | | | | |  | Yes |  | No | | |  | | Information not available | |
| *If yes, provide details:* Click or tap here to enter text. | | | | | | | | | |
| **Does this Applicant’s name appear on the most recent** [**Consolidated List**](https://www.dfat.gov.au/international-relations/security/sanctions/consolidated-list)**?** | | | | | |  | Yes |  | No | | |  | |  | |
| **Are there any named persons, Institutions or places of work within the Applicant’s supplied CV that appear on the most recent** [**Consolidated List**](https://www.dfat.gov.au/international-relations/security/sanctions/consolidated-list) **(also includes tuition fee payments or sponsorships from Sanctioned countries/designated persons).** | | | | | |  | Yes |  | No | | |  | |  | |
| *If yes to the last two questions, the application is deemed high risk and will not be progressed for academic assessment.* | | | | | | | | | | | | | | | |
| 1.2 Program details | | | | | | | | | | | | | | | |
| **Type of program:** | | | | | |  | Doctorate | | |  | | | Research Masters | | |
| **(Proposed) Principal Supervisor’s name:** | | Click or tap here to enter text. | | | | | | | | | | | | | |
| **School/Centre/Institute:** | | Click or tap here to enter text. | | | | | | | | | | | | | |
| ***IMPORTANT***: If an individual is subject to a sanctions' regime, this may prevent the person from undertaking the research activity for which they are being admitted. The applicant should therefore not be enrolled prior to finalisation of assessment. The research project assessed and approved at admission should remain for the duration of the candidate’s program. In instances where a change is requested, this will be subject to reassessment as well as approval by DFAT (as per the individual’s student visa condition), which can be a lengthy process and may not be approved. Any amendments to the research activity cannot commence until approval is obtained. | | | | | | | | | | | | | | | |
| *If the applicable sanctions regime is* ***Former Yugoslavia, Guinea-Bissau, Mali, Ukraine (not Ukraine Regions) or Yemen,*** *no further sanctions assessment is required.* | | | | | | | | | | | | | | | |

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | | | | | | | | | | | | | | | | | | |
| SECTION 2: RESEARCH PROJECT | | | | | | | | | | | | | | | | | | |
| *Completed by Principal Supervisor* | | | | | | | | | | | | | | | | | | |
| **Research project title:** | | | | | Click or tap here to enter text. | | | | | | | | | | | | | |
| **Project details:**  *Please answer the following questions. Your responses should be in plain English. Please try to define technical terms and avoid using acronyms.* | | | | | | | | | | | | | | | | | | |
| **What is the aim of the research?** | | | | | | | | | | | | | | | | | | |
| Click or tap here to enter text. | | | | | | | | | | | | | | | | | | |
| **What goods and equipment will be used?** | | | | | | | | | | | | | | | | | | |
| Click or tap here to enter text. | | | | | | | | | | | | | | | | | | |
| **What, if any, materials will be used?** | | | | | | | | | | | | | | | | | | |
| Click or tap here to enter text. | | | | | | | | | | | | | | | | | | |
| **What, if any, specialised software and/or technology will be used?** | | | | | | | | | | | | | | | | | | |
| Click or tap here to enter text. | | | | | | | | | | | | | | | | | | |
| **Does the research involve any external overseas organisations or affiliates (i.e., in terms of funding, intellectual property, research collaboration, deliverables, etc.)? If yes, provide details including name of organisation, business registration number, address of organisation, name of contact person, telephone number and email.** | | | | | | | | | | | | | | | | | | |
| Click or tap here to enter text. | | | | | | | | | | | | | | | | | | |
| **Will any of the program be done offshore?** | | | | | | Yes  No  *If yes, provide details:* Click or tap here to enter text. | | | | | | | | | | | | |
|  | | | | | | | | | | | | | | | | | | |
| SECTION 3: ARMS OR RELATED MATERIEL | | | | | | | | | | | | | | | | | | |
| *Completed by Principal Supervisor* | | | | | | | | | | | | | | | | | | |
| 3.1 Overview | | | | | | | | | | | | | | | | | | |
| **What are arms or related materiel?**  There is no exhaustive definition of arms or related matériel in Australian sanctions law. Arms or related materiel includes items specifically designed for military use and ‘dual-use’ goods, which are designed for civilian use but may also have military applications.  **How to determine if an item is arms or related materiel**  Determining whether an activity involves any items considered arms or related materiel is a potentially complex assessment that requires you to think broadly about the range of items involved in the activity. This includes all components, systems, equipment, materials, software, technology and finished items. There are two steps to determining if an item is arms or related materiel:   * Step 1 – Search for the item on the Defence and Strategic Goods List (DSGL) – see section 3.2. * Step 2 – For items not on the DSGL, determine whether the item has intrinsic military utility – see section 3.3. | | | | | | | | | | | | | | | | | | |
| 3.2 Step 1 – Searching the Defence and Strategic Goods List (DSGL) | | | | | | | | | | | | | | | | | | |
| The [Defence and Strategic Goods List](https://www.defence.gov.au/business-industry/export/controls/export-controls/defence-strategic-goods-list) is a list of items that have either a direct military use or both a military and civilian use (dual-use). For the purpose of sanctions assessments, items on the DSGL are generally considered arms or related materiel.  The DSGL includes military goods and nonmilitary goods that are inherently lethal (Part 1) and dual-use items (Part 2) in the following broad categories – nuclear materials and facilities; materials, chemicals, microorganisms and toxins; electronics; computers; telecommunications and information security; sensors and lasers; navigation and avionics; marine; and aerospace and propulsion.  The DSGL is a long and complex list. It is strongly recommended that you use the [self-assessment guide](https://www.defence.gov.au/business-industry/export/controls/export-controls/defence-strategic-goods-list) for controlled items and read the [DSGL search guide](https://www.griffith.edu.au/research/research-services/research-policy-performance/export-trade-controls/DSGL-Self-Assessment-Search-Guide.pdf) to assist with this process.  If you have insufficient detail in the research proposal submitted for the admission or change of topic application, you will need to obtain a more detailed proposal so that when the DSGL controls are searched, all technologies and materials that may form part of the proposed research project or potentially accessed during the candidature are included in the search.  If you still need assistance, you should contact the Export Control and Security Manager; [exportcontrol@griffith.edu.au](mailto:exportcontrol@griffith.edu.au).  Once you have completed the DSGL assessment, answer the questions below. | | | | | | | | | | | | | | | | | | |
| **Did you conduct a search of the DSGL?**  (NB: Conducting a search of the DSGL is mandatory) | | | | | | | |  | Yes | | | | | | | | | |
| **What search terms did you use?** | | | | | | | | | | | | | | | | | | |
| Click or tap here to enter text. | | | | | | | | | | | | | | | | | | |
| **Did any of your search terms return matches?** | | | | | | |  | Yes |  | | No - *If no, you may skip to section 3.3* | | | | | | | |
| **For items captured by the DSGL, provide the item number and explain why it is captured, making reference to any relevant technical thresholds or other pertinent details.** | | | | | | | | | | | | | | | | | | |
| Click or tap here to enter text. | | | | | | | | | | | | | | | | | | |
| **For items captured by the DSGL, explain the involvement that the individual will have with the item. Australian sanctions laws affecting the activities of universities include the prohibition of the supply of certain goods and services (including training) to sanctioned countries.** | | | | | | | | | | | | | | | | | | |
| Click or tap here to enter text. | | | | | | | | | | | | | | | | | | |
| 3.3 Step 2 – Determining whether an item has intrinsic military utility | | | | | | | | | | | | | | | | | | |
| An item that is not on the DSGL may still be considered arms or related materiel. Specifically, any item that has intrinsic military utility may be considered arms or related materiel.  To assess whether an item has intrinsic military utility you should focus on the nature of the item itself, including its design, structure and function, and you also need to consider the end use and end user of the item, which in some cases may indicate that the item is arms or related matériel.  If dealing with an individual or entity in a high-risk region (e.g., a country involved in armed conflict) you must exercise a high degree of caution and due diligence in identifying the likely end use and end user.  You do not need to complete this section for items that are on the DSGL. | | | | | | | | | | | | | | | | | | |
| **Does any material or technology that the applicant is proposed to be exposed to or trained on during their candidature have intrinsic military utility?** | | | | | | | | | | | | | | |  | Yes |  | No |
| **If you answered yes above, please provide details of the item, including technical specifications, why you believe it has military utility, and the end use and end user of the item.** | | | | | | | | | | | | | | | | | | |
| Click or tap here to enter text. | | | | | | | | | | | | | | | | | | |
| **If you answered yes above, explain the involvement that the applicant will have with the item, including what they will use it for, the level of access they will have to it (e.g., will they be supervised or have unrestricted access), and whether they will receive training or receive technical assistance on the item.** | | | | | | | | | | | | | | | | | | |
| Click or tap here to enter text. | | | | | | | | | | | | | | | | | | |
|  | | | | | | | | | | | | | | | | | | |
| SECTION 4: RECOMMENDATIONS | | | | | | | | | | | | | | | | | | |
| *Completed by Principal Supervisor, HDR Convenor, Dean Research and Dean GGRS* | | | | | | | | | | | | | | | | | | |
| A person who makes a false declaration is liable to penalties of perjury. In addition, Australian sanctions laws impose serious penalties for breaching sanctions laws. | | | | | | | | | | | | | | | | | | |
|  | | | | | | | | | | | | | | | | | | |
| 4.1 – HDR Supervisor | | | | | | | | | | | | | | | | | | |
| **Name:** | | Click or tap here to enter text. | | | | | | **Organisational unit:** | | | | | Click or tap here to enter text. | | | | | |
| * I have completed all parts of this form as per instructions and all information provided on, or attached to, this form is true and correct to the best of my knowledge. * I confirm that no change will be made to the proposed research activity, approval will be sort from the Griffith Graduate Research School if any changes to the research activity are proposed. | | | | | | | | | | | | | | | | | | |
| **Signature:** | | | Click or tap here to enter text. | | | | | | **Date:** | | | | | Click or tap to enter a date. | | | | |
| **Comments:** | | | Click or tap here to enter text. | | | | | | | | | | | | | | | |
| ***Next step*** – forward to the HDR Convenor who will submit to the Dean Research for review and recommendation. | | | | | | | | | | | | | | | | | | |
|  | | | | | | | | | | | | | | | | | | |
| 4.2 – HDR Convenor | | | | | | | | | | | | | | | | | | |
| **Name:** | | Click or tap here to enter text. | | | | | | **Organisational unit:** | | | | | Click or tap here to enter text. | | | | | |
| **Confirm that the terms that the Supervisor has used to search the DSGL are appropriate for the research proposal.** | | | | | | | | | | | | | | |  | Yes |  | No |
| **Signature:** | | | Click or tap here to enter text. | | | | | | **Date:** | | | | | Click or tap to enter a date. | | | | |
| **Comments:** | | | Click or tap here to enter text. | | | | | | | | | | | | | | | |
| ***Next step*** – forward to the Dean Research for review and recommendation. | | | | | | | | | | | | | | | | | | |
|  | | | | | | | | | | | | | | | | | | |
| 4.3 – Dean Research | | | | | | | | | | | | | | | | | | |
| **Name:** | | Click or tap here to enter text. | | | | | | | | **Group:** | | Click or tap here to enter text. | | | | | | |
| I have reviewed the details provided on this form. Based on the information available, I consider the proposed research activities involved with this appointment:  **Low Risk:** being that no aspect of the research proposed to be conducted involves supply of sanctioned technology or services to the applicant and the proposed research involves no access to high-risk equipment and materials, no access to DSGL items or technologies, and no access to technologies that are related in any manner to weapons of mass destruction.  **Medium Risk:** being that it is unlikely that any aspect of the research proposed to be conducted involves supply of sanctioned technology or services to the applicant but it falls within a discipline or University area in which the proposed research needs to be managed in a manner that removes the possibility of access to controlled equipment and materials including DSGL items, and that there is no access to technologies that are related in any manner to weapons of mass destruction.  **High Risk:** there is the prospect that any aspect of the research proposed to be conducted might involve supply of sanctioned technology or services to the applicant or the proposed research might involve access to high-risk equipment and materials or access to DSGL items or technologies, or technologies that are related to weapons of mass destruction. | | | | | | | | | | | | | | | | | | |
|  | Do not raise any concerns in relation to Australian sanctions law (**Low Risk**). *(Progress the form and the online application recommendation to the Dean, GGRS)* | | | | | | | | | | | | | | | | | |
|  | Raises some concerns and request modification of the research proposal to facilitate the application being assessed as low risk. *(Return the form and the online application recommendation to the HDR Convenor/Principal Supervisor)* | | | | | | | | | | | | | | | | | |
|  | Raises some concerns that should be reviewed by the Group HDR Sanctions Assessment panel (**Medium/High Risk**). *(Progress the form for consideration by the Group Sanctions Assessment panel and progress the online application recommendation to the Dean, GGRS. Progress the form to the Dean, GGRS once assessed by the panel.)* | | | | | | | | | | | | | | | | | |
| **Signature:** | | | Click or tap here to enter text. | | | | | | **Date:** | | | | | Click or tap to enter a date. | | | | |
| **Comments:** | | | Click or tap here to enter text. | | | | | | | | | | | | | | | |
|  | | | | | | | | | | | | | | | | | | |
| **Outcome from Group HDR Sanctions Review Panel (if applicable):** | | | | | | | | | | | | | | | | | | |
| **Meeting date:** | | | | Click or tap to enter a date. | | | | | | | | | | | | | | |
|  | Proceed with the candidature offer (**Low Risk**) | | | | | | | | | | | | | | | | | |
|  | Request modification of the research proposal | | | | | | | | | | | | | | | | | |
|  | No offer of candidature (**Medium/High Risk**) | | | | | | | | | | | | | | | | | |
| **Comments:** | | | Click or tap here to enter text. | | | | | | | | | | | | | | | |
|  | | | | | | | | | | | | | | | | | | |
| 4.4 – Dean, Griffith Graduate Research School | | | | | | | | | | | | | | | | | | |
| **Name:** | | | Click or tap here to enter text. | | | | | | | | | | | | | | | |
| I have reviewed the information contained on this form. Based on the information available, I consider the proposed research activities involved with this appointment: | | | | | | | | | | | | | | | | | | |
|  | Do not raise any concerns in relation to Australian Sanctions Law **(Low Risk)** | | | | | | | | | | | | | | | | | |
|  | Raises some concerns **(Medium/High Risk)** | | | | | | | | | | | | | | | | | |
| I make the following recommendations: | | | | | | | | | | | | | | | | | | |
|  | Proceed with the candidature offer or change as described | | | | | | | | | | | | | | | | | |
|  | The application should be reviewed by the Group HDR Sanctions Assessment panel | | | | | | | | | | | | | | | | | |
|  | No offer of candidature | | | | | | | | | | | | | | | | | |
| **Signature:** | | | Click or tap here to enter text. | | | | | | **Date:** | | | | | Click or tap to enter a date. | | | | |
| **Comments:** | | | Click or tap here to enter text. | | | | | | | | | | | | | | | |