



**Prifysgol Cymru**  
Y Drindod Dewi Sant  
**University of Wales**  
Trinity Saint David

# Trusted Research and Innovation Policy

Mae'r ddogfen hon ar gael yn Gymraeg ac yn Saesneg | This document is available in Welsh

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### 1. Introduction

The principles underpinning Trusted Research and Innovation aim to support the integrity of the University's international research collaboration, which is vital to the continued success of its research and innovation activity. UWTSD has a commitment to effective international collaboration in research and innovation and must ensure that this takes place with integrity and within strong ethical frameworks. This means that we must engage in positive risk awareness, adopt key mitigation and risk protocols that minimise threats and empower the University's researchers and innovators to make informed decisions. While academics working in STEM subjects, dual-use technologies, emerging technologies and commercially sensitive areas are most at risk from potential threats to intellectual property, sensitive research and personal information, the Policy also covers the appropriate due diligence process that should be taken to assess the suitability of any international research or innovation partner, regardless of the discipline or area of research.

### 2. Purpose

The Policy is based directly on the UKRI Trusted Research and Innovation Principles (2021)<sup>1</sup>, as well as those of the Centre for the Protection of National Infrastructure<sup>2</sup>, which set out the principles that should be followed when conducting international research and innovation collaborations. Those principles have been produced in consultation with the research and university community and are designed to help the research and innovation sector get the most out of international scientific collaboration whilst protecting intellectual property, sensitive research and personal information. The principles are intended to help our researchers, funders and industry partners to have confidence in international collaboration and make informed decisions around those potential risks. They also highlight areas where we need to take appropriate measures to protect research and staff from potential theft, misuse or exploitation.

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<sup>1</sup> <https://www.ukri.org/about-us/policies-standards-and-data/good-research-resource-hub/trusted-research-and-innovation/>

<sup>2</sup> <https://www.npsa.gov.uk/system/files/Trusted%20Research%20Guidance%20for%20Academia.pdf>

### 3. Scope

An appropriate due diligence assessment to make an informed judgement about partner stability should be undertaken. This should address the areas outlined below. Where a risk to the project findings and the potential usages is identified, reasonable and proportionate mitigations should be implemented in line with UWTSD's risk appetite prior to the collaboration being agreed. Examples of factors that could be taken into consideration when identifying risk are detailed below. The Trusted Research & Innovation Checklist in **Annex 1** should be completed as an initial assessment which covers these areas of risk.

#### 3.1 Legal Framework and Affiliations

An understanding is required of the legal framework and constitution of the partner organisation and/or the country in which it operates, who it is owned by and whether it has any formal affiliations with other entities such as other businesses, government departments or the military. If any affiliations pose a potential risk to the integrity of the handling of project information or project outputs, then mitigations should be put in place. This should take account of any obligations applicable under the National Security and Investment Act.

#### 3.2 Values

It is important to understand the democratic and ethical values of the country that the partner is based in and where these might differ from our own. There are various resources that could support organisations in recognising potential risks associated to the project and when mitigations may be required, depending on the nature of the project and the partners involved.

#### 3.3 Conflicts of Interest

Ensuring an individual-level awareness of people interacting with UWTSD is essential to assessing potential security related risks. Appropriate due diligence should be undertaken to identify existing or potential conflicts of interest posed by individuals who will have physical and/or virtual access to UWTSD via employment, study, collaboration, visits or access to data. Risk indicators that should be considered include whether a person has:

- Any military affiliations
- Other employment or affiliations
- Any upheld allegations of breaches of research integrity or ethical standards

#### 3.4 Project Activity and Outputs

In any collaboration all partners should formally agree when commercially relevant and/or sensitive data and/or findings derived from the project can be made publicly available. The ability to meet this requirement should be considered in the assessment of partner suitability. Where necessary, it may be appropriate to seek protection for the knowledge asset including any intellectual property prior to its publication or for a high-level version to be published instead. When a decision is made to publish research findings, the outputs should comply with the UWTSD open access and research data management data policies.

### 3.5 Data Management and Security

Transparency and openness are integral to the success of research and innovation, without this the benefits of such activity cannot be fully realised. However, this requirement must be balanced with the need to safeguard information and knowledge sharing. It is therefore essential that researchers are satisfied that UWTSD's robust information security management measures can be followed so that access to sensitive data and information is appropriately managed. The following areas of concern must be explicitly addressed in the project's Research Data Management Plan, and the partner will not meet the appropriate thresholds if these cannot be assured:

- **Cyber Security.** UWTSD data security policies must be followed to ensure cyber controls and security.
- **Separation of Data.** Sensitive data must be securely stored and, where a shared platform is used for information exchange, data should be logically separated into different locations so that it is only accessible by authorised individuals
- **Access to Data.** Access to sensitive data should only be given to individuals with a clear requirement for access, for the duration that such access is required. The basis for the handling and usage of the data should be clearly specified, understood and agreed by all parties prior to information being shared. It is important to be aware of any local legislation that may apply to overseas partners that might permit authorities to access sensitive information without consent from all parties.

### 3.6 Funding

The University is required by grant funding conditions to have policies and processes in place and to carry out appropriate due diligence when providing funding to third-party organisations. When funding is to be provided to third parties based overseas, we have to follow the UKRI Trusted Research and Innovation Principles, which are available at the following website: <https://www.ukri.org/about-us/policies-standards-and-data/good-research-resource-hub/trusted-research-and-innovation>. In these cases, investigators must also complete an 1) export control assessment and 2) the UWTSD Trusted Research & Innovation Checklist. It may also be necessary to undertake due diligence when we receive funding from third-party organisations, for example through a sub-award or collaboration agreement. This is particularly important for collaborations with partners overseas whom we have no prior history of working with, or in countries with elevated risks (e.g. security or corruption).

### 3.7 Commercial Application

Before any research activity commences, and prior to final project approval, collaboration agreements should be in place to ensure that sensitive data and any intellectual assets including intellectual property rights derived from the project are appropriately managed, particularly where there is potential for future commercial outcomes to be realised which could benefit society and the economy including that of the UK.

### 3.8 Intellectual Assets and Intellectual Property Rights

The intellectual assets including any intellectual property arising from the project should

be managed in a professional and business-like manner. This might include deciding when it is most appropriate to seek protection for the intellectual property arising from the project and subsequently how to exploit, assign, license or disseminate it to maximise its impact.

### 3.9 Export Controls

UK export controls are designed to restrict the export and communication of sensitive technology or strategic goods, with the aim of preventing weapons of mass destruction (WMD) proliferation and countering international threats such as terrorism. The controls apply equally to the academic community as to any other exporter, and from an academic perspective may touch on a range of areas of academic exchange which might enable technology transfer, either verbally, physically or electronically. Failure to obtain a license to export controlled goods (or transfer knowledge on related controlled technologies) may result in a criminal offence being committed. The following routine academic activities could be covered by export control:

- Research on behalf of an international partner
- International collaboration
- Presentations at conferences
- Export of materials
- Teaching
- Academic exchange with a colleague at an overseas institution

Please refer to the detailed guidance produced in the UWTSD Export Control Policy

## 4. Policy: Due Diligence Procedure for International Research and Innovation

Due diligence involves undertaking a reasonable and proportionate investigation into the suitability of third-party organisations that are potential collaborators and/or subcontractors on international research and innovation projects. The level of due diligence undertaken should be proportionate to the level of risk involved, balancing the impact on the University were something to go wrong against the costs of mitigating such risks. Due diligence may cover the following areas:

Governance and Control	Ability to Deliver	Financial Stability
Governance	Past Performance	Financial viability
Fraud, bribery, corruption, money laundering and slavery	Staff capacity and capability (number, track record)	Financial Management e.g. experience of finance team and segregation of duties
Internal controls	Infrastructure and programme management for research	Strength of audit, internal and external
Risk Management	Monitoring and management	Value for money
Ethics	Training	Policies, procedures and systems – incl IT systems
Assurance Processes	Equality and Diversity	Separate bank account

Research Governance	Data Management	Income from other sources – diversity of income streams
Scientific Misconduct	Openness and Publications transparency	

#### 4.1 Basic Due Diligence

The basic due diligence procedure is outlined in **Annex 2**. Investigators, working with INSPIRE, should undertake this basic due diligence on all potential international research and innovation partners. The basic due diligence procedure should also be considered as an initial step at the pre-application stage even where full due diligence described below may ultimately be required, so any potential issues may be identified at an early stage. INSPIRE will advise on what further steps are necessary, which may include a full due diligence assessment or further risk assessment.

#### 4.2 Full Due Diligence

The full due diligence procedure is outlined in **Annex 3**. Investigators, working with INSPIRE should undertake this full due diligence procedure on all potential research partners based overseas where they would be recipients of more than £30,000 GBP over the course of a research project. It must also be completed when the initial basic Due Diligence Procedure, and / or Trusted Research and Innovation Checklist identifies any areas of concern. This is regardless of the level of funding involved. The full due diligence procedure is based on a template Due Diligence Questionnaire that has been prepared by the Association of Research Managers and Administrators (ARMA) UK, funded by UKRI and Research England. Investigators should work with partner organisation to complete this Due Diligence Questionnaire, and this should be done before the start date of the grant and any transfer of funds. Guidance for partner organisations is included in **Annex 4**.

#### 4.3 The Due Diligence Process

Generally due diligence will be undertaken with support from INSPIRE. Investigators must inform INSPIRE as early as possible about third-party organisations they are considering working with to allow this to take place. It is important to note that due diligence is not a pass or fail exercise. Where concerns arise, these must be escalated to the appropriate level to assess whether there are ways to mitigate any risks and to make a decision whether to proceed.

#### 4.4 Ongoing Due Diligence

Due diligence is an ongoing process that should not stop once an award has been made. Where necessary, INSPIRE will undertake regular finance checks and require overseas organisations to provide evidence to ensure sub-contracted funding is being used for the purposes that it was awarded, and that expenditure claimed complies with grant terms and conditions. These will again be completed in a risk-based way with more checks being undertaken where the risks are higher. Projects must have appropriate processes before funds are transferred to overseas organisations, which

could include: requiring receipt of formal invoices; provision of proof of purchases; regular progress reports; etc. We should consider imposing further checks for high risk projects or organisations.

## **5. Monitoring**

The use and effectiveness of the Policy will be monitored by the INSPIRE Management Group and reported to the Research Committee on an annual basis.

## **6. Misuse of Policy**

The Policy seeks to protect the University and its researchers from breaching legal requirements and funding obligations that may arise from the misuse of intellectual property, sensitive research and personal information, or the misuse of public funds. It protects people and infrastructure from potential theft, manipulation and exploitation, including as a result of interference by hostile actors. This includes legal controls on transfers of sensitive information, technology, equipment and software. Misuse of the policy may result in an offence being committed under for example, the National Security and Investment Act 2021.

## **7. Links to other policies / procedures**

### **7.1 UWTSD Data Governance Policy.**

The University Data Governance Policy exists to ensure relevant data is fit for the purposes of internal and external reporting, and is appropriately categorised for storage, retrieval, destruction, backup, and access as needed to ensure proper management and protection of Institutional data. The Data Governance Group (DGG) looks after Data Governance and is accountable to Operational Leadership Team (OLT). The DGG are available to identify the most appropriate and cost effective options for data categorisation, storage, and reporting, allowing utilization of existing infrastructure and tools where appropriate. The DGG should be consulted for advice and awareness when considering data management for any research project and this can be achieved by submitting an IT Service Desk ticket in the first instance.

### **7.2 UWTSD Export Control Policy (Research & Innovation)**

The UWTSD Export Control Policy provides guidance and resources for academic staff undertaking and supervising research and innovation activity which may be subject to export control. Export controls are needed for a variety of reasons, including national security and international treaty obligations. In the UK, the control of strategic goods and technology is undertaken by the Export Control Joint Unit (ECJU), and compliance with export controls is a serious obligation. Legal controls on transfers of sensitive technology, equipment and software are intended to manage the risks of their being misused to: fuel conflict, threaten national security, support terrorism and crime, violate human rights or proliferate Weapons of Mass Destruction.



### 7.3 Research Ethics and Integrity Policy.

The Research Ethics and Integrity Policy expresses UWTSD's commitment to ethical standards by setting out the general ethical principles which the University requires its researchers to follow. The code also defines what is meant by research misconduct and the procedure to be followed if researchers fail to meet the University's ethical standards.

### 7.4 Research Data Management Policy

This Research Data Management Policy defines the responsibilities at individual and institutional level which should guide the work of those involved in research data collection, curation, storage and maintenance. It sets out the basis on which the University's staff and postgraduate research students will process any personal data collected from data subjects in the course of conducting research, or that is provided to those conducting research by data subjects or other sources for the same. The policy ensures that research data produced by its staff and postgraduate research students will be managed to the highest standards throughout the research data lifecycle in line with relevant legislation.

## 8. Further useful information and guidance

- The National Protective Security Authority (NPSA) works with partners in government, police, industry and academia to reduce the vulnerability of the national infrastructure. They have worked with research funders to produce : [Trusted Research Guidance for Academia | NPSA](#)
- UK Government provides helpful guidance on export controls relating to academic research: [export controls applying to academic research.](#)
- UK Government guidance sets out what may count as technology transfer in the context of export controls. The full advice should be consulted here: [Exporting military or dual-use technology: definitions and scope](#)
- UK Strategic Export Control Lists which are available on the UK Government website here: [UK Strategic Export Control Lists](#)
- Information relating to arms embargoes is available here: [Trade sanctions, arms embargoes, and other trade restrictions](#)



## Annex 1. Trusted Research & Innovation Checklist

### Organisational Details

<b>Name of Organisation</b>
<b>Country where organisation is based:</b>
<b>Registration number and name of registration body (examples of relevant registration bodies are government, tax, corporation, charity, educational authority):</b>
<b>What is the legal status of the organisation? (for example: public university, private university, charity, private company, non-profit making company, government research organisation, independent research organisation) Please include the date of foundation. Note: We may be required to ask for evidence of this at a later stage.</b>
<b>Is your organisation affiliated to any other organisation? (i.e. is the organisation legally part of a larger organisation or a group of larger organisations).</b>
<b>Name(s) of investigators in the organisation who will be responsible for the collaborative research and innovation</b>

<b>About new partners</b>	
<b>Why does a partner want to work with you?</b>	
<b>What are they expecting in return for their financial support or involvement?</b>	
<b>Is the organisation associated with a country which may be viewed as</b>	

<b>hostile to the UK or one which has different democratic and ethical values from our own?</b>	
<b>Has due diligence into the partner identified any involvement in research on behalf of the military or police with links to a hostile state?</b>	
<b>Set within the context of any information gained from due diligence, could your research be misused or have unintended applications which would be negative?</b>	
<b>Are there any legal, regulatory or university policy constraints on undertaking your research with this partner?</b>	
<b>Having considered the answers to the above questions, are there potential reputational or ethical risks to you or the university?</b>	

<b>About research relationships</b>	
<b>Are the terms of any proposed Memorandum of Understanding (MoU) in keeping with the expectations of your department and university?</b>	
<b>Are you providing existing intellectual property (IP), research data, confidential or personally identifiable data to the project? If so, how is this going to be protected?</b>	
<b>Who will own any IP that is generated?</b>	

<b>Do you have plans in place for protecting the resulting IP?</b>	
<b>What contractual requirements are you able to put in place to protect the interests of your academic institutions?</b>	
<b>What access will the research partner have to your IT network? If they do have access, what broader visibility might this provide?</b>	
<b>Is there any physical separation or protection required between research in similar fields?</b>	

<b>About existing partners</b>	
<b>Would proceeding with the research raise potential conflicts of interest with existing research partners?</b>	
<b>Have you spoken with your existing partners about any potential conflict of interest?</b>	
<b>Have you considered the terms of any non-disclosure agreements? Does this include an expectation that you will need to provide visibility to existing partners?</b>	
<b>Will this research breach any existing contractual agreements that you, your department or university already have?</b>	

**Completed by:**

**Date:**

## Annex 2. Basic Due Diligence Procedure

The following steps should be considered:

- a) Check with INSPIRE to determine whether we have conducted due diligence on this organisation previously (although if this was undertaken more than 3 years previously, consider whether this needs to be repeated).
- b) If it is an unfamiliar organisation try to speak to colleagues both within and potentially outside the University to see what their experiences have been.
- c) Gather any information you have on the organisation, and determine how they came to be identified as a potential partner.
- d) Carry out an online search on the organisation, both their official web site and for any news stories. This should provide an indication of the activities at the organisation and any good or bad news stories. It might also provide evidence of other projects the organisation has been involved in, and reveal whether they have the capacity to carry out the required research and/or provide the relevant services.
- e) Review their annual report, which should provide an indication of their financial viability, and potentially details of other organisations they have previously worked with.
- f) Ask the organisation either directly or via the academic(s) involved whether they have completed similar due diligence for any other UK HEIs or other entities, and if so whether they are able to provide details.
- g) Check the corruption index for the country the organisation is based in. This can be found at [Corruption Perceptions Index](#) and provides a useful indication of the level of corruption within the country concerned and therefore may increase the levels of risk regarding funding going to organisations within these countries.
- h) Check UK and UN sanctions lists and the FCDO website for information on individual countries, key risks and to highlight when sub-contracting with an organisation in the country is illegal or too high a risk.
- i) Undertake a Dunn and Bradstreet review (this will perform several of the checks including identification of any Politically Exposed People).

### Appendix 3. Full Due Diligence Procedure

This Questionnaire should be completed by all overseas organisations that work with UWTSD as collaborators or subcontractors on research projects where they would receive more than £30,000 GBP in funding over the lifetime of the research project. It must also be completed when the initial basic Due Diligence Procedure, and / or Trusted Research and Innovation Checklist identifies any areas of concern. This is regardless of the level of funding involved.

This Questionnaire and associated Guidance are based on a template developed by the Association of Research Managers and Administrators (ARMA) UK on behalf of UKRI. We are required by our funding conditions to undertake these checks. This form and any attachments must be completed in English.

**Note 1:** UKRI have now introduced a simplified due diligence questionnaire to be used when undertaking due diligence on research intensive universities in developed countries so that checks are in line with those undertaken by UKRI on the equivalent UKRI universities to ensure they comply with UKRI grant terms and conditions. INSPIRE will advise if the simplified due diligence questionnaire should be used.

**Note 2.** UKRI have also introduced an enhanced due diligence questionnaire to be used in addition to the standard due diligence questionnaire when there is a high risk of funds being used for illegal purposes or where there is a high risk of terrorist activity (see FCDO website to identify this).

### **Due Diligence Questionnaire**

The University of Wales Trinity Saint David (the institution) will keep this information on record for the purposes of risk management and compliance. It may be shared with staff, professional advisors, partners, auditors, regulators and funders as required in the performance and assurance of due diligence connected with this project or other research projects where we are collaborating with you.

☐ **I/We** confirm that I/we have authority to submit this form on behalf of my organisation\*

☐ **I/We** confirm that I/we consent to the information submitted being used for the purposes stated above\*

☐ **I/We** confirm that all information entered is complete and accurate to the best of my/our knowledge and belief, having made reasonable enquiries\*

The institution may receive requests for access to this information from UK research institutions and research funders who are considering partnering with you. Please confirm if you are happy for the information to be shared for these additional purposes.

☐ **I/We** confirm that the information can be shared for these additional purposes

☐ **I/We** do not wish for the information to be shared for these additional purposes

If you do not provide your consent, we will direct any requesting parties to contact you directly.

The information will not be shared with third parties for any other purpose without your prior consent.

Agreed on behalf of \_\_\_\_\_

by Signatory 1:

Signature	Name	Role	Date

Signatory 2 (if applicable):

Signature	Name	Role	Date

\*required

## SECTION A: ORGANISATION DETAILS

This section is about your organisation as a whole. Please provide information relating to your organisation's overall structures and processes.

### 1. Organisational Governance

a) Name of organisation:	
b) Registered address:	
c) Country where organisation is based:	
d) Registration number and name of registration body (examples of relevant registration bodies are government, tax, corporation, charity, educational authority):	
e) What is the legal status of the organisation? (for example: public university, private university, charity, private company, non-profit making company, government research organisation, independent research organisation)	
f) Is your organisation affiliated to any other organisation? (Is your organisation connected to any other organisation in an official capacity or share any governance structures with another organisation.) If yes, please give details.	
g) Please provide the name and role/job title of the head of the Organisation (for example Chief Operating Officer / Chief Executive / Principal)	
h) Please provide the name of the key contact for research-related matters and details of their role for the organisation that can provide further information if required (for example the Director of Research and/or Finance, or a designated spokesperson).	



## 2. Policy, Processes and Procedures

Please describe how your organisation manages the following matters. You may have a policy for some or all of these areas, in which case please provide this. If your organisational policies and procedures do not correspond to these specific categories, please describe the processes that you follow that have the closest match or are most relevant to the areas listed.

Please include how staff are made aware of your approach and how frequently your organisation's policies, processes and/or procedures are reviewed.

	Response
a) <b>Anti-fraud, corruption and bribery / whistleblowing</b> - Refers to reporting systems for wrongdoing in research	
b) <b>Travel and subsistence</b> - How is travel organised – through the institution or personally? Do you have a policy containing acceptable rates and guidance for travellers? If yes, please provide a copy/link	
c) <b>Conflict of Interest</b> - Refers to anyone standing to benefit personally or anyone with close relatives or friends who stand to benefit financially from proposed research activities, for example through sub-contracts	
d) <b>Preventing Harm/ Safeguarding</b> - Refers to the protection of all research participants, particularly children under the age of 18 and vulnerable adults, from harm and details an appropriate response when harm does occur. The scope of safeguarding covers sexual exploitation, abuse and harassment and broader forms of violence, abuse and harassment of research participants, communities and research staff	
e) <b>Health and Safety</b> - How do you minimise risk of physical injury to anyone involved in a research project	
f) <b>Risk Management</b> - This could cover travel risk, financial risk, reputational risk etc	
g) <b>Ethics</b> -How you ensure appropriate care of human or animal participants in research projects and compliance with legislation and other relevant regulations. Does your organisation have an Ethics Committee?	
h) <b>Staff</b> - What are your processes for recruiting staff, and do these comply with local labour laws and the UK Modern	

Slavery Act? Please see FAQ glossary for further information on this	
i) <b>Financial Procedures</b> - Refers to delegation of authority for signing off/approving expenditure, and responsibilities for managing research income and expenditure?	
j) <b>Research Integrity/ Research misconduct</b> – Good research practice and what process is followed when an individual deliberately or negligently does not adhere to accepted practices	
k) <b>Research data management and data protection</b> - How do you protect/manage personal and confidential data collected during a research project?	
l) <b>Procurement</b> - What rules/processes do you have to follow for making purchases? e.g. of equipment or other materials, necessary to carry out a research project	

### 3. Response to risks around misconduct, including fraud

This section is about understanding your organisation's processes for resolving issues relating to misconduct and identifying any areas of risk that may impact the delivery of research projects in order to plan appropriate resolutions.

Where information is requested relating to the last three years, this can mean calendar years, financial years, academic years, or similar. You may provide information relating to the annual periods that your organisation normally reports on.

	Response
a) Has there been any instances of fraud or misuse of project funds across the organisation in the last three years? And if so, can you tell us how this was dealt with?	
b) In the last three years has the organisation been subject to: <ul style="list-style-type: none"> <li>i. any claims or disputes by collaborators in relation to research projects</li> <li>ii. been required to repay any research funds</li> <li>iii. been subject to early termination of a research contract where the organisation was at fault?</li> </ul> If yes to any of the above, please give details of the issue(s) and how they were resolved.	

c) Is the organisation currently or expecting to be involved in any legal proceedings that may impact on achieving the objectives of the project or result in reputational damage to the organisation and/or the individuals involved in the project?	
d) Have any of the organisation's senior staff (since they have been employed at this organisation or whilst employed at a previous organisation) have been found to be involved in, or suspected of, any of the following in the last three years? i. fraud ii. financial misconduct iii. scientific misconduct iv. bribery or corruption If yes to any of the above, how was the organisation made aware of the allegation? If the allegation was substantiated, can you tell us how this was dealt with?	
e) Can you provide the name of the key contact and details of their role for the organisation that can provide further information if required?	

#### 4. Sub-contract management

4.1. Please could you outline any due diligence that you undertake on your sub-contractors to assess their suitability to carry out the work required <i>Note: This may be a specific policy or otherwise, please describing your approach to recruiting and managing sub-contractors</i>	
4.2. Please provide the name of the key contact and details of their role for the organisation that can provide further information, if required	

#### 5. Ability to deliver: grant administration

	Response
a) Please provide a brief outline of the three biggest research projects (by financial value to your organisation) that your	

	organisation is currently or was recently (in the last three years) working on.	
b)	How is research grant administration organised within the organisation?	
c)	Does your organisation have a policy or strategy for researcher development? If yes, who is responsible for administering or delivering this?	
d)	Who has overall responsibility for the management of research grants across the organisation? This could be an individual or a designated group such as a research office.	
e)	How do you monitor finances for individual projects separately from the rest of the organisation? E.g. will this be a specific project number / separate bank account?	
f)	You will be required to adhere to funder reporting requirements for individual projects. This may include quarterly detailed transaction listings for all expenditure incurred using grant funds, scanned receipts for transactions, and evidence of staff hours worked on the project. Are you able to comply with these reporting requirements if necessary?	
g)	How will staff hours worked on research grants be evidenced to ensure staff have worked as stated on grant applications?	
h)	Can you provide the name of the key contact and details of their role for the organisation that can provide further information if required? This could be an individual or a designated office.	

## 6. Ability to deliver: finance

a)	Please provide copies to the last three years of the financial reports or a link to the web page where they are published if available.	
b)	Does the organisation have a bank account held in the organisation's name, which can receive grant funds in GBP?	YES/NO

<b>c)</b> Is the organisation able to pay sub-contractors who are based outside of your own country?	YES/NO
<b>d)</b> Does the organisation need prior authorisation from another body or government in order to accept and/or disburse funds relating to research projects?	YES/NO  If yes, please give details of the circumstances in which this is applicable, the process and timeline for authorisation.
<b>e)</b> How do you manage foreign currency exchange risks where the income is in a different currency than the expenditure?	
<b>f)</b> Does the organisation have an internal audit function?	YES/NO
<b>g)</b> Has the organisation been subjected to any internal/external audits on post award financial research management within the last three years? YES/NO If no, when was the last time an internal or external audit was carried out, and by who?	
<b>h)</b> Does the organisation hold public liability insurance that covers work relating to externally funded research projects, and to what value or limit?	YES/NO  If yes, please give the expiry date and details of the renewal process if applicable.
<b>i)</b> Does the organisation have professional indemnity insurance that extends beyond the life of the project and to what value or limit?	YES/NO
<b>j)</b> Please provide the name of the key contact and details of their role for the organisation that can provide further information if required?	

## 7. Country-specific information

7.1 Are there any local, regional, national requirements that may impact on the project e.g. import controls, ethics, research permit etc.?	YES/NO  If yes, please describe.
7.2 Are there any external fees or charges that the organisation would be subject to in order to be able to carry out externally funded research projects? e.g. fees for ethical review, withholding tax and licenses.	YES/NO  If yes, please provide details.

## SECTION B: PROJECT DETAILS

This section is exclusively about the research project in question. Please answer these questions with information specific to the way the project will be managed

### 1. Project Governance

	Response
1.1. Please describe the governance and project management arrangements that are specific to this project, including the names and roles of the person/people responsible for academic management and administrative management, if different. Please include how project expenditure is authorised, processed and paid, and who is responsible at each stage.	
1.2. Please can you provide the names and roles of the following key personnel that are specific to this project, including email and phone number? i. Persons responsible for financial management and reporting ii. Key legal contact iii. Project manager if applicable (or other administrative support for the project)	
1.3. Please identify any third parties/subcontractors which will be receiving funding from this grant and the amount which will be disbursed to each.	
1.4. Please provide details of any conflicts of interest from key personnel, or any of their family or people living within the same household and how this will be managed.	
1.5. What ethical review will this project be subject to?	
1.6. Research misconduct - have any of the key personnel been subject to an investigation into research misconduct where the allegations have been upheld?	
1.7. Have any of the key personnel had publications retracted?	YES/NO    If yes, please give reasons

1.8. Do you have any other comments or is there anything else that you feel UKRI should be made aware of?	
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### Document Checklist

Please complete this table to indicate whether you have included the documentation required as part of this assessment.

If you are not able to supply certain documents (for instance a policy not in existence in your organisation) please indicate why this is the case.

Document	Enclosed		Comments
	Y	N	
Evidence of legal status			
Organogram			
Anti-fraud, corruption & bribery policy			
Travel & subsistence policy			
Conflict of interest policy			
Safeguarding/Preventing Harm policy			
Health and Safety Policy			
Risk Management Policy			
Ethics Policy			
Recruitment and Selection Policy			
Financial Procedures			
Research Integrity/Misconduct Policy			



## **Annex 4. Due Diligence Questionnaire Guidance**

Due Diligence is the investigation, or exercise of care, that a reasonable business or person is expected to take before entering into an agreement or contract with another party. It supports good decision-making – understanding costs, benefits and risks.

This questionnaire is designed to help facilitate successful partnerships, by understanding the way that each of us work we can help support each other throughout the project. It also ensures that all parties are able to meet the funder requirements and to accept the terms and conditions of the grant. As funders require their terms and conditions to be cascaded down to all of those involved in the project, it is important that the project partners understand what is required before the project starts.

The questionnaire provides all project leads with a consistent approach for conducting Due Diligence, with the aim of reducing the administrative burden for all involved.

It is important to realise that it may not always be possible to answer every question, and that a lack of policies or processes does not mean that the project and partnership cannot go ahead, but rather allows the parties to enter into a discussion about how certain elements will be managed.

It may not be appropriate to use the full question set for each partner and you may select to use fewer questions from the set, taking account of the nature of the partner, the value and assessed risks of the planned research project.

This questionnaire has been developed as part of a project led by the Association of Research Managers and Administrators (ARMA) UK, funded by Research England and UK Research & Innovation.

### **Who should complete this form?**

This form should be completed by legal, financial, research management and/or compliance/risk management personnel within your organisation. One individual should be nominated to be the key contact person for this form (in case there are any questions) and also have the authority to sign this form upon submission in order to confirm its accuracy.

### **How should this form be completed?**

The form should be completed, in English, to the best of your knowledge and supply the relevant documentation which is requested. If you are unable to respond to specific questions or provide documents in English, please contact the UK Lead for further support and guidance.

### **What if I have any questions?**

If you have any questions about how to complete the Due Diligence Questionnaire, please contact the UK lead institution by email.

## **Section A: Organisation Details**

### **1. Organisational Governance**

We want to understand what type of organisation you are, how long you have been operating and whether you have a formal attachment to any other organisations. This includes any previous affiliations whereby a formal partner might still retain significant influence over your organisation or retain a high level of access to your organisation and its research or staff. We are looking to understand how you are registered and with who. Relevant supporting documents may include your registration documents and any Memorandum or Articles of Association. We are looking to understand how your organisation is structured and what the decision-making processes are.

### **2. Policy and procedures**

We are looking to understand what processes you have in place to manage areas that are important for the success of the research project and what support we can offer to ensure the project's success. URL links to policies (especially those in English) for any of the described areas would be very useful. We are also looking to understand any regulatory requirements you may have to undertake to participate in the project.

### **3. Response to risks around misconduct, including fraud**

We are trying to understand your organisation's processes for resolving issues relating to misconduct and fraud and identifying any areas of risk that may impact the delivery of research projects in order to plan appropriate resolutions.

### **4. Sub-contract management**

Lead organisations are expected to undertake compliance checks on expenditure incurred by sub- contractors and therefore must understand what due diligence checks you undertake on your sub- contractors and how we can ensure they are operating in accordance with the funder's terms & conditions.

### **5. Ability to Deliver: grant administration**

We are trying to understand what experience your organisation has in participating in and managing externally funded collaborative research projects, including if you have no prior experience of participating in externally funded collaborative research projects. We are looking to understand the scale and scope of research projects you have previously been involved with. Information about the funder, the total value of the project, and the value of the project you were responsible for and the number of organisations involved in the project would be useful information. We are trying to understand how externally funded research projects are managed and administered in your organisation.

### **6. Ability to deliver: finance**

We are looking for evidence of how externally funded projects are financially managed within your organisation. We are looking for evidence to support the assessment of the financial security of your organisation and how risks can be mitigated if necessary. We are looking for evidence that your organisation will still exist during the project to ensure its successful delivery. We are looking to determine how we can ensure the project funds are paid to your organisation safely. We are looking to understand what internal and external checks are undertaken within your organisation relating to financial transactions. Supporting evidence could include audit reports from internal or external auditors or financial regulators. We are trying to establish what insurance cover you have and that it is appropriate for the project being undertaken.

## **7. Country-specific information**

We are looking for any information about requirements that must be taken into consideration when planning the successful delivery of the project. Examples could be issues like import or export controls, local ethics requirements, permits required to undertake projects, government approval to receive funds and the level of any associated fees.

## **Section B: Project Details**

## **8. Project governance**

We are looking for information for how the project will be managed on a day-to-day basis. We would like to know how project-specific risks are managed, how the finances are managed and by who. We are looking for assurance that the project will be conducted in accordance with all regulatory requirements and that those involved are appropriate for the project being conducted. We are looking for information about other organisations involved in the project, whether they will receive funds from the project and if so how they are being managed. We are trying to understand what resources you have available and whether they are sufficient for the project's needs, or if there is anything we can provide to support the successful outcome of the project

## **Useful Links:**

- Trusted Research for Academia: <https://www.cpni.gov.uk/trusted-research>
- Department for Business, Energy and Industrial Strategy Research & Development Roadmap: <https://www.gov.uk/government/publications/uk-research-and-development-roadmap>

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Policy author(s):

**Dr Matt Briggs**

**Head of Research Development**

Document version control

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**Approval**

*The policy will be formally considered and approved in accordance with Committee Terms of Reference outlined in the Academic Quality Handbook.*

*If the policy affects staff, advice should be sought from HR at the outset to ascertain if consultation is required at JCC. HR will also provide advice on the most appropriate stage to consult with JCC and on whether approval by Council is required*

*ALL policies submitted for approval must be accompanied by a completed:*

- [Equality and Welsh Language Impact Assessment](#)
- [Institutional Impact Assessment](#)
- [Data Protection Impact Assessment](#)

*Prior to submission to committee, authors are asked to consult the Policy and Planning Team who will check that the document complies with University requirements. The Policy and Planning Team will complete the section below.*

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**For completion by the committee secretary**

*Please tick to confirm the following:*

*An institutional Impact Assessment has been completed* ☒

*An EIA and Welsh Language Assessment has been completed* ☒

*A DPIA has been completed* ☒

*Matters requiring consideration by the approving committee:*



**Prifysgol Cymru**

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