

# Foreign Engagement Policy

## Section 1 - Key Information

<b>Policy Type and Approval Body</b>	Administrative - Vice-Chancellor
<b>Accountable Executive - Policy</b>	Deputy Vice-Chancellor (Future Growth)
<b>Responsible Manager - Policy</b>	Pro Vice-Chancellor (Educational Partnerships)
<b>Review Date</b>	30 May 2026

## Section 2 - Purpose

(1) This Policy sets out the University's approach and commitment to complying with key legislation and guidelines applicable to the University's dealings and interaction with foreign governments, entities, and individuals, namely:

- a. [Charter of the United Nations Act 1945 \(Cth\)](#)
- b. [Weapons of Mass Destruction \(Prevention of Proliferation\) Act 1995 \(Cth\)](#)
- c. [Autonomous Sanctions Act 2011 \(Cth\)](#)
- d. [Defence Trade Controls Act 2012 \(Cth\)](#)
- e. [Foreign Influence Transparency Scheme Act 2018 \(Cth\)](#) ('FITS Scheme')
- f. [Guidelines to Counter Foreign Interference in the Australian University Sector \('UFIT Guidelines'\)](#)
- g. [Australia's Foreign Relations \(State and Territory Arrangements\) Act 2020 \(Cth\)](#) ('FAS Scheme')

## Section 3 - Scope

(2) This Policy applies to:

- a. all staff
- b. students
- c. honorary appointees
- d. and other members of the University where relevant

## Section 4 - Key Decisions

<b>Key Decisions</b>	<b>Role</b>
Determine whether to notify a government agency of a foreign interference risk	Senior Executive Group
Determine whether the Minister for Foreign Affairs of a foreign arrangement pursuant to the FAS Scheme	Chair of the Foreign Engagement Review Group
Determine whether an arrangement with a Foreign Principal is registrable with the Attorney-General's Department under the FITS Scheme	Vice-Chancellor

Key Decisions	Role
Determine whether a permit will be requested from the Minister of Foreign Affairs under the Sanctions regime	Pro Vice-Chancellor (Research) or Executive Director, Research Office
Determine whether a permit will be requested from the Minister for Defence under the Defence Trade Controls Act	Executive Director, Research Office

## Section 5 - Policy Statement

(3) The University recognises the strategic importance of the higher education sector to Australia's national interests. It also recognises the risks posed by undisclosed foreign influence and foreign interference, including the risk of cyber incursions (e.g. a cyber attack).

(4) The University is committed to proactively taking reasonable steps to:

- a. ensure it complies with the compliance obligations and commitments set out in this Policy; and
- b. protect Australia's national interests, the safety of the university community, safeguard academic freedom and manage the risk of foreign interference in its operations.

(5) It is the responsibility of all staff, students, honorary appointees and other members of the University to:

- a. undertake appropriate levels of due diligence in relation to the proposed projects/arrangements, partners and personnel;
- b. have regard to the University's compliance obligations and commitments, assess the potential for foreign interference, especially in research/technology areas considered by the government to be critical technologies in the national interest (Critical Technologies); and
- c. take all necessary steps to ensure compliance with the legislative compliance obligations and commitments referenced in this Policy.

(6) The University will apply a risk-based approach to compliance and embed risk mitigation strategies in its processes to assist staff, students, honorary appointees and other members of the University to comply with the compliance obligations and commitments referenced in this Policy.

(7) All staff, students, and other members of the University are expected to seek advice about their compliance with this Policy where they are unsure, and report any concerns or possible breaches as soon as possible and in line with this Policy (see below for further detail).

(8) Failure to comply with this Policy may result in disciplinary action and, in some cases, could result in criminal prosecution.

## Section 6 - Procedures

(9) The following procedures set out how to comply with this Policy.

### Part A - Overview of the Legislation and Foreign Interference Guidelines

#### Sanctions Regime and Non-Proliferation

(10) Australia's [sanctions regime](#) is intended to help protect Australian's national security and strategic priorities.

Australia's sanctions regime is comprised of the [Charter of United Nations Act 1945 \(Cth\)](#) and [Autonomous Sanctions Act 2011 \(Cth\)](#).

(11) The [sanctions regime](#) prohibits organisations such as the University and individuals from:

- a. supplying certain goods to sanctioned countries;
- b. importing sanctioned goods;
- c. providing a sanctioned service – which includes the provision of training;
- d. engaging in sanctioned commercial activities (e.g. purchasing or selling shares in entities operating in certain industries or providing credit to certain entities);
- e. dealing with/making assets available to 'designated persons' or 'designated entities' (who are listed on DFAT's Consolidated List); or
- f. using or dealing with a controlled asset (e.g. an asset owned or controlled by a designated person or designated entity or a person/entity acting on their behalf), without a permit having been obtained first from the Minister for Foreign Affairs.

(12) Individuals and the University can be held liable for a breach of Australian sanction laws if they cannot demonstrate that 'reasonable precautions' were taken, and 'due diligence' was exercised in relation to the relevant activity.

(13) Examples of how the sanctions regime can impact the University include:

Activity	Potential Sanctions exposure
Enrolling a student, employing a staff member, appointing a person to an honorary position or inviting a visiting academic to La Trobe where they have been deemed to be a 'designated person' (i.e. they appear on DFAT's Consolidated List).	Making assets available to or dealing with the assets of a designated person
Approving a research topic or a change to a research topic of a graduate research candidate from a sanctioned country which relates to a sanctioned good and that research is considered "technical training."	Providing a sanctioned service
Undertaking research collaborations with, or providing other services to a person or entity from a sanctioned country in an area relating to a sanctioned good and that research/service is considered "technical advice, assistance or training".	Providing a sanctioned service
Undertaking research, education or other collaborations with a designated person or entity.	Making assets available to designated persons or entities
Travelling overseas to present at international conferences, which may be attended by individuals from sanctioned countries, and delivering technical advice, assistance or training in relation to a sanctioned good.	Providing a sanctioned service

(14) Further information about Australia's sanction regime can be found on the Department of Foreign Affairs and Trade's [sanctions website](#), including:

- a. detailed information about the [sanctions regime](#) and measures applicable to each sanctioned country;
- b. the [Consolidated List](#) which is a list of all individuals and entities listed under Australia's sanctions regime as being the subject of financial sanctions and/or travel bans; and
- c. a General Guide for Universities [Factsheet](#).

(15) The University also has:

- a. an intranet site about sanctions compliance, which can be accessed [here](#); and
- b. a plain language summary of the [Autonomous Sanctions Act 2011](#) which can be found on the University's Compliance [site](#).

## Defence Trade Controls Act 2012 (Cth)

(16) The [Defence Trade Controls Act 2012 \(Cth\)](#) ('DTCA') and [Customs Act 1901](#) (Cth) regulates the supply, publication and brokerage of defence and strategic goods, technology, and software listed on the [Defence and Strategic Goods List \(DSGL\)](#).

(17) The DTCA is intended to prevent such activities where it could assist the proliferation of conventional weapons and weapons of mass destruction. The [Weapons of Mass Destruction \(Prevention of Proliferation Act\) 1995 \(Cth\)](#) also prohibits supplying or exporting goods or providing services in circumstances where a person reasonably suspects they may assist in a weapon of mass destruction program.

(18) The DTCA is not intended to restrict the transfer of information or research, but, similar to sanctioned activities, where research involves goods, technology and software are listed on the DSGL, permission will generally be required in the form of a permit from the Australian Minister of Defence.

(19) The DSGL is divided into two parts:

- a. Part 1: 'Munitions List' – which contains an extensive list of military/defense-related goods and technologies, and non-military goods and technologies that are inherently lethal, destructive, or incapacitating (e.g. civilian firearms and explosive equipment).
- b. Part 2: Dual-use Goods – which contains an extensive list of the specific goods and technologies that have a 'dual-use', meaning these goods and technologies were developed for a benign purpose, but could be adapted for military use. The list includes goods and technology which fall under broad categories such as: nuclear materials, electronics, various chemicals, micro-organisms and toxins, sensors and lasers, computers and other technology.

(20) Permits must be obtained from the Australian Minister of Defence before the export/supply, publication or brokerage of controlled goods or technologies on the DSGL can occur. For example before:

- a. goods or technologies listed in Part 1 or Part 2 of the DSGL are supplied outside of Australia (which includes the intangible transfer (e.g. an electronic transfer) of DSGL technology); and
- b. publications involving goods and technology listed in Part 1 can be published.

(21) There are a number of exemptions that can apply to the obtaining of a permit (and advice should be sought in accordance with this Policy if in doubt). For example, a permit may not be required where:

- a. the work is already in the public domain;
- b. the research constitutes 'basic scientific research' as defined in the DTCA;
- c. the goods or technology are deemed to be medical equipment;
- d. the publication relates to Part 2 - dual use goods or technology (though the Minister for Defence may issue a notice prohibiting publication of certain dual-use DSGL technology if they reasonably believe publication would prejudice Australia's security, defence, or international obligations).

(22) Further information on the DTCA can be found on:

- a. the Australian Government's Department of Defence [website](#), which includes a [DSGL Self Assessment Guide](#); and
- b. the La Trobe Research Office [website](#).

(23) A plain language summary of the legislation can also be found on the University's Compliance [site](#).

## Foreign Influence Transparency Scheme Act 2018 (Cth)(FITS)

(24) The [Foreign Influence Transparency Scheme Act 2018 \(Cth\)](#) ('FITS') provides public and government decision-makers with visibility on the nature, level and extent of foreign influence on the Australian government and its political processes.

(25) FITS requires individuals and the University to register with the Attorney-General's Department any arrangements they have with Foreign Principals (as defined in [section 10 of the FITS Act](#)) where it relates to activities which may exert foreign influence upon the Australian Government.

(26) The types of [registrable](#) activities include:

- a. Parliamentary lobbying – seeking to influence a member of Australian federal parliament or their staff on behalf of a Foreign Principal;
- b. General political lobbying – seeking to influence a Commonwealth public official, Commonwealth department, agency or authority, registered political party or candidate in a federal election on behalf of a Foreign Principal;
- c. Communications activities – the dissemination of information or material to the general public for the purpose of political or government influence (which could include certain research and other publications); and
- d. Disbursement activities – including the distribution of money or things of value on behalf of a Foreign Principal.

(27) Particular attention as to whether an activity is registrable should be paid in circumstances where a foreign government or government official is funding, involved in or stands to benefit from the particular activity.

(28) Further information about FITS can be found on:

- a. the Australian [Attorney-General's website](#); and
- b. the University's [Foreign Engagement](#) page on the intranet.

(29) A plain language summary of the legislation can also be found on the University's Compliance [site](#).

## Universities Foreign Interference Taskforce Guidelines (UFIT)

(30) The [Guidelines to Counter Foreign Interference in the Australian University Sector](#) ('UFIT Guidelines') are a set of recommendations issued by the Australian Government to universities and research organisations to help manage the risk of foreign interference.

(31) The UFIT Guidelines also help manage the risk of breaches of the [Criminal Code Act 1995 \(Cth\)](#) as it relates to espionage (which includes recklessness as to the risk of espionage).

(32) The University will take reasonable steps to embed appropriate business practices to align with the four key areas identified in the UFIT Guidelines, namely:

- a. Governance and risk frameworks – a framework for managing the risk of foreign interference in respect of people, information, and assets;
- b. Communication, education and knowledge sharing – a communication plan and education program to raise awareness and support the mitigation of foreign interference risks;
- c. Due diligence, risk assessments and management – a requirement that conflicts of interest and work involving critical technology be declared and appropriate levels of due diligence be conducted having regard to the nature of the activity and foreign interference risks;
- d. Cybersecurity – having adequate controls to proportionately mitigate cyber incursion risks, including educating individuals on best practice.

(33) Considering and managing the risk of foreign interference is particularly important where the University is undertaking research involving what the Australian Government considers to be a '[Critical Technology](#)'.

## **Australia's Foreign Relations (State and Territory Arrangements) Act 2020 (Cth)(FAS)**

(34) Australia's [Foreign Relations \(State and Territory Arrangements\) Act 2020 \(Cth\)](#) (referred to as the Foreign Arrangement Scheme or FAS) requires the University to notify the Minister for Foreign Affairs of all 'written arrangements' (which includes agreements/contracts, understandings or undertakings) that it proposes to enter with a 'foreign entity'. A foreign entity includes: - a foreign country; a foreign government, department, or agency; public authorities established for a public purpose (such as public research institutes, medical research centres and military academies); local public authorities (such as municipal councils) as well as foreign universities that lack 'institutional autonomy'.

(35) The Minister for Foreign Affairs may vary or terminate the arrangement if the government considers it to be contrary to Australia's foreign policy.

(36) Further information can be found on the Department of Foreign Affairs and Trade [website](#) and the La Trobe Foreign Engagement [intranet](#) site. A plain language summary of the legislation can also be found on the University's Compliance [site](#).

## **Part B - Due Diligence and Risk Management**

(37) Undertaking appropriate due diligence is fundamental to ensuring compliance against the obligations set out in this Policy. Due diligence is about undertaking reasonable enquiries to ensure the party/ies with who the University will be interacting are reputable/appropriate, ensuring any proposed activity complies with relevant compliance obligations or commitments and identifying, assessing and then mitigating risk.

(38) Before conducting research involving critical technologies or interacting with a foreign individual or entity for or on behalf of the University, staff, students and other members of the University must:

- a. obtain all necessary internal approvals for the proposed activity in line with this and other relevant University policies; and
- b. be confident that the activity is compliant with the legislation outlined in this Policy.

(39) Undertaking appropriate due diligence includes completing the University's [Foreign Engagement Risk Assessment Tool](#), which is intended to ensure that the following compliance checks, risk identification and management processes have been conducted, namely:

- a. checking whether the individual or entity is listed in the sanctions [Consolidated List](#) and subject to financial or other sanctions;
- b. checking the [DFAT sanctions website](#) to determine whether the University could, as part of the proposed arrangement, potentially import or supply a sanctioned good or service (which includes providing training, technical advice or assistance in relation to a sanctioned good) to an individual/entity from a sanctioned country;
- c. using the Department of Defence's Online Defence and Strategic Goods List and Self-Assessment Guide to ensure any activity complies with the DTCA and whether a permit from the Minister for Defence is required;
- d. ensuring all Conflicts of Interest has been declared in accordance with the University's [Conflict of Interest Policy](#);
- e. ensuring all registrable foreign influence activities have been declared and registered with the Australian Attorney General in accordance with the FITS Act;
- f. completing and submitting a [Foreign Arrangement Notification Form](#) to the Foreign Engagement Review Group

on [foreign.arrangements@latrobe.edu.au](mailto:foreign.arrangements@latrobe.edu.au) when the proposed activity includes a Foreign Arrangement as defined under the FAS Act;

- g. reporting activities involving Critical Technologies deemed by the Department of Industry, Science and Resources to be in the national interest to the relevant business area; and
- h. considering the risk of foreign interference in line with the UFIT Guidelines (particularly where critical technologies are involved), and ensuring there are adequate controls in place to manage any identified risks, including weighing the benefits of establishing the intended partnership against the identified risks.

(40) The assessment of foreign interference and legal compliance risks is ongoing, and should be considered throughout the arrangement/project or undertaking. In addition, changes in the geo-political environment might also be a relevant consideration. Where a contract is involved, the ongoing consideration of such risks also forms part of contract management throughout the term of a contract – see the [Contracts Policy](#).

## Part C - Responsibilities

### Individuals

(41) It is the primary responsibility of staff, students, honorary appointees and other members of the University to ensure their university-related activities comply with the legislative compliance obligations and compliance commitments set out in this Policy.

(42) Before engaging with a foreign individual or entity or undertaking research involving Critical Technologies staff, students and other members of the University are expected to:

- a. undertake appropriate due diligence, risk assessment and management as set out in Part B Due Diligence and Risk Management;
- b. complete the [Foreign Engagement Risk Assessment Tool](#). NB, once submitted, you will receive an email with your case ID and a summary of your responses. Within two weeks, you will receive a follow up email advising whether or not any permit and/or notification requirements have been identified and/or potential risk of foreign interference have been flagged, so that these can be adequately mitigated via a Foreign Engagement Risk Management plan.
- c. develop a Foreign Engagement Risk Management Plan when required to do so, and ensuring all responsibilities listed in Part B are carried out.
- d. where acting as principal supervisor for a graduate research candidate with connections to a country which is subject to sanctions, also complete a sanctions assessment form when assessing an applicant for candidature and once enrolled ensure a new sanctions assessment is completed if their topic changes.
- e. where the proposed activity involves or may involve a Foreign Arrangement, submit a [Foreign Arrangement Notification Form](#) via [foreign.arrangements@latrobe.edu.au](mailto:foreign.arrangements@latrobe.edu.au)
- f. contact the relevant business area(s) listed below if they have any questions of compliance concerns:
  - i. Educational Partnerships – [foreign.arrangements@latrobe.edu.au](mailto:foreign.arrangements@latrobe.edu.au)
  - ii. Research Office in relation to research and industry engagement activities – [researchoffice@latrobe.edu.au](mailto:researchoffice@latrobe.edu.au)
  - iii. Graduate Research School in relation to graduate research activities – [Admissions.GRS@latrobe.edu.au](mailto:Admissions.GRS@latrobe.edu.au)
  - iv. In all other cases, the Foreign Engagement Review Group on [foreign.arrangements@latrobe.edu.au](mailto:foreign.arrangements@latrobe.edu.au)
- g. notify the Foreign Engagement Review Group where they believe someone connected to the University may be in breach of the requirements set out in this Policy or the compliance obligations and commitments referenced in it. All concerns raised will be treated confidentially.
- h. complete training as directed by the Foreign Engagement Review Group or a Responsible Officer for any compliance obligation/commitment listed in this Policy.



(43) The risk of sanctions breaches and foreign interference should also be considered as part of the recruitment and honorary appointment process, particularly where:

- a. the incumbent is connected to a sanctioned country; or
- b. may have access to University systems or assets (including intellectual property) which may be valuable or of national significance (e.g. Critical Technologies).

(44) In such circumstances, Hiring Managers and those responsible for approving honorary appointments should consider the individual's previous employment with a foreign government or entity and seek advice from People & Culture where risk factors are identified.

(45) People & Culture will escalate issues to the Foreign Engagement Review Group as appropriate.

(46) As part of managing educational partnerships, the Educational Partnerships Office will ensure appropriate due diligence has been conducted in accordance with the [Educational Partnerships Policy](#) as well as the [Foreign Engagement Risk Assessment Tool](#). Any compliance concerns regarding Educational Partnerships, must be escalated to the Pro Vice-Chancellor (Educational Partnerships) in the first instance.

## Researchers

(47) While the obligations set out in the Policy apply to all University activities, given the nature of the obligations, it is particularly important that researchers understand their obligations and comply with this Policy to ensure their research activities are lawful and that foreign interference risks are identified and appropriately mitigated as set out in Part B and Part C of this Policy.

## Research Office

(48) As part of managing research grants and contracts involving a foreign individual or entity, or Critical Technologies, the Research Office will ensure that Principal Investigators have completed the [Foreign Engagement Risk Assessment Tool](#). The Research Office will assess the content, take reasonable steps to check it has been completed correctly, provide compliance advice to the researcher/school as required and escalate compliance concerns to the Executive Director, Research Office ('ED RO') as appropriate.

(49) Where compliance risks are identified, the Principal Investigator or Principal Supervisor will be responsible for:

- a. developing a Foreign Engagement Risk Management Plan and ensuring such risks are appropriately addressed and managed throughout the project as they apply across all legislative requirements. For example, where research involves a critical technology or a sanctioned good or technology, consideration will need to be given as to how the foreign interference and/or sanction breach risk will be managed throughout;
- b. ensuring that the risk management plan is communicated to all individuals involved in the project on a need-to-know basis;
- c. informing offices of the University providing administrative services in support of the research project or individuals involved in the research project, that the project is being conducted under a Foreign Engagement Risk Management Plan.

(50) Foreign Engagement Risk Management Plans should be provided to the Research Office who will review and record the plan, and submit it to the Foreign Engagement Review Group for their review and secure storage.

(51) The Executive Director, Research Office will:

- a. in accordance with the [Research Contracts and Grants Policy](#), only execute contracts where satisfied the proposed arrangement is legally compliant and appropriate due diligence has been conducted, including foreign



- interference risks have been considered and, if identified, mitigated;
- b. notify the Foreign Engagement Review Group where a permit under the DTCA or sanctions regime is or may be required; and
- c. escalate compliance concerns to the Foreign Engagement Review Group as appropriate.

## **Graduate Research School (GRS)**

(52) The GRS and Schools will undertake an assessment of all applications by international students for admission to higher degrees by research and all applications where the proposed research project involves Critical Technologies as outlined in the clauses below, and take reasonable steps to ensure appropriate due diligence has been undertaken, including ensuring relevant permits have been applied for where Part 1 DGSL technology is involved and no exemption(s) apply and the proposed research complies with this Policy.

(53) For graduate research applications, the initial assessment will be undertaken by the intended Principal Supervisor of the applicant who has the appropriate knowledge and skill to understand the proposed area of research to recognise whether there are compliance issues. For applicants in Joint PhD programs where the Principal Supervisor is employed at an overseas institution, the primary La Trobe University supervisor will be responsible for this task.

(54) The Graduate Research School will ensure that Principal Supervisors have completed the [Foreign Engagement Risk Assessment Tool](#) where required, before an application for a higher degree by research candidate to work on that project is considered. The Graduate Research School will assess the content, take reasonable steps to check it has been completed correctly, and provide a copy to the Research Office for review if necessary or where compliance risks have been identified.

(55) Where compliance risks are identified, the Principal Supervisor will be responsible for the actions listed above under the heading 'Research Office' at clause (47) and providing a copy of the risk management plan to the Research Office.

(56) Where a student has connections to a sanctioned country, the GRS will also ensure the appropriate [UNSC and Autonomous Sanctions Compliance Assessment Form](#) is completed to determine if the research topic:

- a. relates to an export sanctioned good; and
- b. whether the project is specialised enough to be considered 'technical training'.

(57) The School Director of Graduate Research (DGR) will review all assessments undertaken by Principal Supervisors for applicants relating to their school. The application will not proceed to the next step without their endorsement.

(58) Principal Supervisors of students from or connected to sanctioned countries are required to notify the Graduate Research School of any change to the student's research topic at any time. Where there is a substantive change in topic, the GRS will ensure the appropriate [Change in Thesis Topic UNSC and Autonomous Sanctions Compliance Assessment Form](#) is completed. Students are also required to ensure that any such change does not conflict with any visa obligations they have.

(59) The Pro Vice-Chancellor (Research) will:

- a. review all graduate research Sanctions Compliance Assessments and determine an appropriate action;
- b. only approve graduate research applications where satisfied the proposed arrangement is legally compliant and appropriate due diligence has been conducted, including ensuring foreign interference risks have been considered and, if identified, mitigated; and
- c. notify the Foreign Engagement Review Group where a permit under the sanctions regime is or may be required; and

- d. escalate compliance concerns to the Foreign Engagement Review Group as appropriate.

## People & Culture

(60) People & Culture (P&C) is responsible for advising on and promoting the University's [Conflict of Interest Policy](#).

(61) People & Culture is also responsible for conducting appropriate pre-employment checks to mitigate the risks of visa or sanctions breaches and/or foreign influence and interference.

## Information Services

(62) Information Services (IS) is responsible for implementing a cybersecurity strategy to limit the risk of a unauthorised cyber-incursions.

(63) In accordance with the UFIT Guidelines, IS will identify and mitigate potential threats to the University's cybersecurity. This includes, creating controls to reduce the risk of a cyber attack and providing training and awareness programs.

(64) Any concerns pertaining to the University's cybersecurity or possible cyber attack should be immediately reported to the Chief Information Security Officer.

## Part D - Foreign Engagement Review Group

(65) The University has established the Foreign Engagement Review Group ('FERG') to assist with and oversee the University's compliance with the compliance obligations set out in this Policy, namely the Sanctions Regime, DTCA, FITS, UFIT Guidelines, and FAS Scheme.

(66) FERG is supported by the Foreign Arrangement Team who administer and coordinate the Foreign Engagement Review Group's activities. The Foreign Engagement Review Group is responsible for:

- a. acting as an advisory body in respect of any compliance concern that is escalated to it in accordance with this Policy;
- b. determining whether a proposed arrangement constitutes a 'Foreign Arrangement' for the purposes of the FAS Scheme and, if so, notifying the same to the Minister for Foreign Affairs;
- c. referring any arrangements to which the FITS Scheme may apply to the Senior Executive Group for consideration. The Vice-Chancellor will decide whether to register the arrangement to the Attorney- General's Department;
- d. notifying the relevant Senior Executive Group member where there is a concern of a real risk of foreign interference and, depending on the circumstances, liaising with government agencies such as the Counter Foreign Interference Coordination Centre (CFICC);
- e. ensuring appropriate induction training regarding the compliance obligations referenced in this Policy is available to all staff, students and other members of the University, and recommending that additional training be undertaken by specific cohorts e.g where they may undertake high-risk activities;
- f. making recommendations to the Accountable Executive regarding changes to this Policy as part of continuous improvement;
- g. promoting compliance with this Policy across the University and developing resources to aid in compliance; and
- h. retaining a secure central record of its activities.

(67) The Foreign Engagement Review Group is comprised of the following staff or their nominees:

- a. General Counsel & Director of Assurance

- b. Pro Vice-Chancellor (Educational Partnerships)
- c. Chief Information Security Officer
- d. Chief Operating Officer
- e. Executive Director, Research Office
- f. Pro Vice-Chancellor (Research)
- g. Pro Vice-Chancellor (Student Experience and Employability)

(68) Other staff may be invited to attend where specialist advice or information is required.

## Section 7 - Definitions

(69) For the purpose of this policy and procedure:

- a. Foreign Arrangement: any written arrangement, agreement, contract, understanding or undertaking between the University and a foreign entity (both legally-binding and not legally-binding), as defined under the Australia's [Foreign Relations \(State and Territory Arrangements\) Act 2020 \(Cth\)](#).
- b. Foreign Entity: means a foreign country; a foreign government, department, or agency; public authorities established for a public purpose (such as public research institutes, medical research centres and military academies); local public authorities (such as municipal councils) as well as foreign universities that lack institutional autonomy (see section 8 of Australia's [Foreign Relations \(State and Territory Arrangements\) Act 2020 \(Cth\)](#)).
- c. Foreign Principal: means foreign governments, foreign political organisations, foreign government-related entities and foreign government related individuals (see section 10 of the [Foreign Influence Transparency Scheme Act 2018 \(Cth\)](#)).
- d. Critical Technologies: refers to technology fields which have high impact of Australia's national interests and presently include:
  - i. advanced manufacturing and materials technologies
  - ii. artificial intelligence (AI) technologies; advanced information and communication technologies
  - iii. quantum technologies
  - iv. autonomous systems, robotics, positioning, timing and sensing
  - v. biotechnologies
  - vi. clean energy generation and storage technologies

The Department of Industry, Science and Resources maintains the List of [Critical Technologies](#) and provides examples of types of technologies may fall within the above categories.

## Section 8 - Authority and Associated Information

(70) This Policy is made under the [La Trobe University Act 2009](#).

(71) [Foreign Engagement \(intranet\)](#)

## Status and Details

<b>Status</b>	Current
<b>Effective Date</b>	30th May 2024
<b>Review Date</b>	30th May 2026
<b>Approval Authority</b>	Vice-Chancellor
<b>Approval Date</b>	30th May 2024
<b>Expiry Date</b>	Not Applicable
<b>Responsible Manager - Policy</b>	Stacey Farraway Deputy Vice-Chancellor (Global & Regional)
<b>Enquiries Contact</b>	Foreign Arrangements Scheme