

Export Control Policy – OU Compliance Statement

In pursuit of its mission to undertake excellent research and provide world-class education, the University engages widely in international research collaboration, global movement of researchers and the exchange of new ideas. However some of the knowledge held, goods used, and activities conducted by academics and researchers have the potential to be misused. Some of the work done at the University is subject therefore to **Export Control** law or the **Academic Technology Approval Scheme** (ATAS, which requires certification of foreign students enrolled on certain advanced courses).

Controls over the export of Strategic Goods or Technology have been enacted in the UK and the EU for decades via a Consolidated list of controlled military and dual-use items (civil technology which may be used for military purposes). In addition all UN members have been required since 2004 to maintain Export Controls to prevent the proliferation of weapons of mass destruction (WMD). UN or EU sanctions may also apply. As a result in some cases individual academics may need an export licence from the **UK Export Control Organisation (ECO)** to carry out an activity - failure to obtain one being a criminal offence. Controls can cover not only tangible goods, but also software, data, technology and know-how.

The trend towards increased international research collaboration requires researchers and universities to become increasingly vigilant as to when export control law applies. Compliance with Export Control should also be seen as part of the broader responsibility for research integrity. As such, the University has published this statement to raise awareness within the institution of Export Control regulations, individual responsibilities and the actions that the University will take to support researchers, including the provision of guidance and advice.

In the academic context, Export Controls are most likely to apply in relation to scientific and technical research with military, nuclear, chemical, biological, missile and aerospace applications. However all researchers, particularly those in the scientific and engineering disciplines, need to be aware of Export Control regulations.

The responsibility for compliance with Export Control regulations rests with the individual researcher. Researchers, particularly in science and engineering disciplines, should ensure that they:

- Have read and understood University guidance on Export Control;
- Are aware whether their research areas may be subject to Export Control legislation.
- Consider the University's guidance on Export Control whenever embarking on an activity that could:
 - lead to the physical or electronic export of goods, software or technology outside the UK;
 - involve goods, software or technology with the potential for military or WMD use;
 - involve the transfer of knowledge within the UK for use in a WMD programmes outside the UK (including through teaching);
 - involve the transit of goods, software or technology through the UK,
 - seek advice and apply for licences as necessary.

In the vast majority of cases Export Controls will not apply, particularly as basic scientific research, and information that is already in the public domain are exempt from the legislation (except where sanctions apply or the item or technology is intended for a WMD use). However, should a researcher suspect that Export Controls may apply to their work, they should seek advice from the RSQ Unit. In some cases it will be necessary to apply for an export licence from the ECO to carry out an activity.

Although responsibility for compliance with Export Control regulations rests with the individual researcher, the University will ensure that it takes adequate measures to support researchers to achieve compliance and ensure that the University itself has complied with the law. To achieve this, the University:

- Has registered with the ECO's SPIRE portal so that queries and licence applications can be submitted to ECO;
- Make available clear guidance, training and sources of advice for researchers seeking information on Export Control regulations;
- Provide particular support as necessary, to researchers working in disciplines most likely to be affected.

Information on the support provided by the University is available on the University's [Export Control](#) webpage (internal only).

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