

# **POLICY ON RESPONSIBLE INTERNATIONAL RESEARCH ACTIVITIES AND COLLABORATIONS**

## **1. Background**

The University recognises that research is a global endeavour of opportunities and operational challenges. We aim to continue to produce world-class research with impact which yields economic, environmental, health, social and cultural benefits across the world. We are committed to encouraging and enabling global collaborations to address major global challenges.

We also recognise that we must navigate complexity to operate in this global environment. This includes regulations concerning potential risks to national security, and the moral and practical considerations when collaborating with partners in low-income countries or in conflict zones, for example. Whilst we encourage international partnerships and open research we want our researchers to be risk aware and to be empowered to make informed decisions. To that end, we utilise the guidance set out in the National Protective Security Authority (NPSA) "[Trusted Research framework](#)".

The Trusted Research framework provides guidance for academia to support the integrity of the system of international research collaboration. It outlines the potential risks of international research to UK research and innovation; helps researchers, UK universities and industry partners to make informed decisions around those potential risks and to have confidence in international collaboration; and explains how to protect research and staff from potential theft, misuse or exploitation.

## **2. Purpose**

This Policy is intended to ensure that the University's approach to international research activities and collaborations align with the University's overall purpose and its commitment to open and responsible research. That commitment specifies that the University will ensure that all its researchers understand their rights and responsibilities, and that the necessary systems and resources are in place to fulfil its professional and compliance obligations, including to the UK's Trusted Research framework.

This Policy outlines the University's approach to ensuring the integrity of its international research activities and collaborations and that they align with its stated values and commitment to academic freedom. It sets out the responsibilities of Principal Investigators (PI), researchers and their research teams, and the processes that need to be applied in order to address the potential risks to University research and innovation from international collaborations. It clarifies the University's approach to protecting its staff, students, research participants and collaborators from these risks.

Guidance to support researchers to comply with this Policy can be found on the University's [Trusted Research](#) website.

### 3. Principles

The University's commitment to global research engagement is underpinned by the following 7 principles:

<b>Academic Freedom</b>	We support and defend the principles of academic freedom whereby research activity is free from political or other pressures, threats, discrimination or intimidation.
<b>Responsible</b>	We will conduct our research responsibly; complying with the laws applicable to the countries involved; understanding and mitigating the risks associated with our research; and protecting it from misuse or theft.
<b>Ethical Engagement</b>	We have high ethical standards that apply to all our research including our international activities and collaborations.
<b>Integrity</b>	We will act with integrity, safeguarding those involved against exploitation or harm and ensuring the fair and equitable sharing of the benefits arising from research.
<b>Equality, Diversity and Inclusion</b>	We will recognise and embrace diversity without discrimination in our research conduct.
<b>Openness</b>	We will engage with pioneering open research practices, where research is more easily shared, scrutinised and built upon to accelerate progress through global collaboration.
<b>Impactful</b>	We will address key global challenges, including improving lives through research into global inequalities, health, climate and the environment, conflict and humanitarian issues.

### 4. Definitions

For the purposes of this Policy, the following definitions apply:

<b>International Collaboration</b>	This takes the broadest sense of collaboration and includes any activity (formal or informal) involving a person/organisation from another country. See Section 3, Scope, below.
<b>Research</b>	Covers a broad definition of research (as defined by Frascati) which is externally funded or internally resourced and activities broadly aligned with research but typically not teaching, learning or commercial activities.

## 5. Scope

This Policy applies to all collaborative activities that relate to research with international organisations/people, whether externally funded or internally resourced, formal or informal, which include but are not limited to:

- Joint projects with overseas organisations.
- The sharing of data with a person/organisation overseas.
- Joint publications with persons overseas.
- International projects where the University is one contributor/site.
- Receipt of funding from an overseas organisation/person.
- Research conducted by staff/students of the University where it has been commissioned by an organisation overseas, including when that organisation is their employer, and/or where the results will be shared with that organisation.
- Research undertaken with international visitors to the University.
- Research involving participants based outside of the UK (even if they are involved remotely).
- Research that involves biological samples derived from humans, plant or animal obtained from outside the UK.
- Research involving IP generated outside of the UK.
- Fieldwork conducted overseas
- Secondments/visits overseas if they relate to research.

## 6. Roles and Responsibilities

**Director of Research and Business Engagement** has overall responsibility for this Policy and for ensuring that appropriate processes are in place to support its implementation.

**The University's Research Compliance Committee (RCC)** sets standards and ensures that the University meets its obligations to comply with the regulations and legislation that govern research. It receives quarterly reports on compliance with this Policy and reports quarterly to the University Planning and Resources Committee and annually to the Board of Governors

**The Trusted Research Operational Co-ordination Group (TROCG)** is responsible for the oversight and maintenance of this Policy and advising RCC about the University's level of operational assurance across the Trusted Research agenda.

**Research Relationships Oversight Group (RROG)** is a formal committee of the University that reviews and provides an assessment of the suitability of higher-risk research funders and research partners, collaborators, or sub-contractors. RROG provides reports to TROCG and reports annually to the Board of Governors.

**Principal Investigators**, leading their research teams, are expected to ensure that any international research collaborations (as defined by this Policy) that they enter into adhere to the expectations set out in this Policy.

**Researchers and other research team members**, whether staff or students, who are involved in international research collaborations (as defined by this Policy) must adhere to the principles and expectations set out in this Policy.

## 7. Expectations

**Note terminology:** ‘researchers’ encompasses the Principal Investigator and all members of the research team, including students.

When engaging in international research collaboration, researchers should have consideration for the University’s stated vision that “we will be recognised globally for the excellence of our people, research, learning and innovation, and for the benefits we bring to society and the environment.”

To that end, and in line with the University’s values and the principles which frame this policy (section 3), researchers are expected to meet the following standards:

### Academic freedom

- a. International collaborations should align with the principle of academic freedom whereby research activity is free from political or other pressures, threats, discrimination or intimidation.

### Research ethics and integrity

- b. Research conducted as part of an international collaboration must meet the standards of research ethics and integrity expected of all research activities conducted by the University of Manchester.
- c. International collaborations must be designed and conducted so that they safeguard those involved against exploitation or harm.

### Equality, Diversity and Inclusion

- d. Collaborations must recognise and embrace diversity without discrimination and as far as possible there should be fair and equitable sharing of the benefits arising from research.

### Responsible compliance, risk assessment and protection of research

- e. Care must be taken to ensure that the appropriate legislation and regulations are applied to all international collaborations in line with the laws applicable to the countries involved.
- f. Researchers are expected to maintain an appropriate level of awareness of the risks applicable to their field of research, including risks to national security, and only initiate a collaboration on the basis of a proportionate and informed assessment of those risks.

- g. When considering an international collaboration, reasonable steps should be taken to understand the potential partner: what their interest in the work is; how they intend to use it; what the partner does in the field; and if there is any risk of subversion, links to modern slavery, links to the tobacco industry<sup>1</sup> or controversial weapons<sup>2</sup>; or potential for reputational damage to the researcher or University by working with them.
- h. Researchers are expected to protect their research (including IP, data, research sites, contacts and funding) from misuse or theft.
- i. Researchers should undertake a continuous and proportionate assessment of the contents and potential consequences of an international collaboration and be prepared to pause or withdraw if it no longer aligns with the principles of this Policy.

## 8. Research Integrity Standards

The University's [Code of Good Research Conduct](#), applies to University staff and students and those who support the University's research as independent contractors/consultants or as visitors, regardless of where the research is being conducted. The University also expects similar high standards from organisations/individuals it collaborates with.

The University's Code of Good Research Conduct requires that research is transparent and robust. Researchers must assess whether a proposed collaboration conflicts with the interests of the University and/or the robustness of the research. They must be transparent about any conflicts and proactively mitigate any personal interests that might be reasonably deemed to compromise impartiality, conflict with their duty as a researcher or potentially result in private benefit.

## 9. Ethical Standards

The University's expectations of the ethical conduct of research involving human participants are set out in its [Policy on the Ethical Involvement of Human Participants in Research](#). Research projects conducted outside of the UK by University staff or students or by a collaborator should be conducted to the equivalent ethical standards and obtain ethical clearance as outlined in the University's [guidance on ethical collaboration](#).

The University's [Policy on the Use of Animals in Research and Teaching](#) sets out the principles upon which all University activities involving animals should be conducted and defines which activities require ethical review. Research and/or teaching, including field work undertaken overseas, must comply with any local regulations in that country and be conducted in accordance with the University's ethical standards.

## 10. Safeguarding

When research overseas involves vulnerable adults or children the University's [Safeguarding Policy](#) will apply. Such research must be appropriately risk assessed and the assessment should consider

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<sup>1</sup> [Cancer Research UK Code of Practice on Tobacco Industry Funding to Universities | Cancer Research UK](#)

<sup>2</sup> [The Convention on Certain Conventional Weapons – UNODA](#)

how the risks identified can be minimised and should also outline the local processes for reporting concerns, as well as taking account of health and safety considerations. Training requirements and records of training undertaken should be recorded in the risk assessment.

## 11. Protecting researchers

Researchers must take reasonable care of themselves and comply with [University policy and arrangements for safe working](#). The University expects researchers to check that organisations with whom they collaborate have similar arrangements for safe working.

## 12. Managing Information

Researchers are responsible for ensuring that research data is managed in accordance with The University's [Research Data Management Policy](#). Such information must be included in a Data Management Plan (DMP), and in protocols that explicitly define the collection, administration, integrity, confidentiality, storage, use and publication of data. Researchers will produce a DMP for every research project.

## 13. Responsible Research

All international collaborations and research activities should be conducted responsibly with consideration to the long term risks to society and the environment of any resulting innovations. To that end, the University will not engage in research involving controversial weapons<sup>3</sup>. As far as possible there should be fair and equitable sharing of the benefits arising from research. When these benefits arise from the use of genetic resources from another country there may be legal obligations under the [Nagoya Protocol](#).

## 14. Legal Compliance

The University requires its staff, students and those it collaborates with to abide by the laws that govern the research, including those mentioned under section 13 above and their legal obligations under the laws applicable to the countries involved.

This includes the UK's legal requirements in relation to the sharing of information with external entities and the protection of personal data. Such requirements are outlined in Export Control legislation and the National Security and Investment Act. The University provides [guidance on establishing secure collaborations](#).

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<sup>3</sup> Controversial weapons are those that have an indiscriminate and disproportional humanitarian impact on civilian populations; the effects of which can be felt long after military conflicts have ended. Controversial weapons exclusion has been adopted in recognition of international conventions and treaties, ratified by the UK government, that deem the production of such weapons to be unacceptable. See Appendix 1 for more details.

Researchers are required to complete a Data Management Plan (DMP) for every research project, including collaborative research, whether or not it is funded. Completing a DMP will help ensure compliance with data protection laws and University and funder policies.

The [University of Manchester Anti-Money Laundering Policy](#) provides guidance on identifying and reporting signs of possible money-laundering.

## 15. Risk Assessment

The first step to protecting the integrity of international research is to have an awareness of the potential risks and an understanding of what needs to be protected. Researchers should follow the University's processes for [identifying the risks inherent in a piece of research](#) and ensure that there are mechanisms in place to manage and mitigate those risks.

## 16. Due diligence

Before engaging in an international research collaboration researchers should take reasonable steps to reassure themselves that they understand who they are engaging with and the wider context in which they are operating. For example:

- Determine the registered name and address of collaborating organisation/s.
- Check there is no association with modern slavery or human trafficking, tobacco or controversial weapons.
- Speak to colleagues (internally or externally) with previous experience of working with the collaborator. This may reassure the researcher of existing successful partnerships, as well as raise any potential concerns.
- Carry out an online search of the collaborator. Good and bad news stories should be considered, as well as evidence of projects that may suggest their capacity to carry out the required research.

Beyond this, institutional due diligence checks may be applied according to the perceived level of risk.

## 17. Protecting research

Researchers are expected to protect their research from theft or misuse by ensuring that:

- an appropriate contract is put in place in line with the [Contracts Governance Policy](#);
- data are stored with the appropriate level of security in line with the University's [cyber security processes](#);
- Staff/students/collaborators and visitors are appropriately [vetted](#).
- institutional due diligence processes are complied with in full
- It is determined whether the research is subject to [export controls](#).
- The University's [finance policies](#) are adhered to.
- Appropriate care is taken when permitting access to University facilities.
- A Data Management Plan (DMP) is completed for every research project

- They comply with the terms and conditions of funders as set out in the grant award or contract.

## 18. Monitoring compliance

This Policy and its implementation are supported by the University’s Trusted Research Quality Management System that incorporates appropriate monitoring and auditing of international research collaborations. The outcomes from these audits will inform and improve practices as part of a commitment to continual improvement. The University will also undertake appropriate benchmarking and may be audited by external bodies. Reports on matters related to this Policy will be provided to the TROCG and RCC.

## 19. Review of Policy

This Policy will be reviewed annually or when significant changes are required.

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Policy title:	Policy on the Governance of International Research Activities and Collaborations
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Version:	0.1
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Related Statutes, Ordinances, General Regulations:	
Equality relevance outcome:	
Related policies:	<ul style="list-style-type: none"> <li>• <a href="#">Code of Good Research Conduct</a></li> <li>• <a href="#">Code of Practice for Investigating Concerns about the Conduct of Research</a></li> <li>• <a href="#">Policy on the Ethical Involvement of Human Participants in Research</a></li> <li>• <a href="#">Policy on the Use of Animals in Research and Teaching</a></li> </ul>



	<ul style="list-style-type: none"> <li>• <a href="#">Nagoya Protocol</a></li> <li>• <a href="#">University policy and arrangements for safe working</a></li> <li>• <a href="#">Contracts Governance Policy</a></li> <li>• <a href="#">export controls</a></li> </ul>
Related procedures:	<a href="#">Trusted Research   Research and Business Engagement   StaffNet   The University of Manchester</a>
Related guidance and or codes of practice:	<a href="#">Trusted Research   Research and Business Engagement   StaffNet   The University of Manchester</a>
Related information:	<a href="#">Trusted Research   Research and Business Engagement   StaffNet   The University of Manchester</a>
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## Appendix 1 Definition of Controversial Weapons

Controversial weapons are those that have an indiscriminate and disproportional humanitarian impact on civilian populations; the effects of which can be felt long after military conflicts have ended.<sup>1</sup>

Controversial weapons exclusion has been adopted in recognition of international conventions and treaties, ratified by the UK government, that deem the production of such weapons to be unacceptable.

International humanitarian law conventions and protocols ratified by the UK which define and prohibit these weapons and related activities include the following:

Biological	Convention on the Prohibition of Biological Weapons (1975)
Chemical	Convention on the Prohibition of Chemical Weapons (1997)
Weapons with Non-detectable Fragments	Protocol I (1983) to the Convention on Certain Conventional Weapons
Incendiary	Protocol III (1983) to the Convention on Certain Conventional Weapons
Blinding Laser	Protocol IV (1998) to the Convention on Certain Conventional Weapons
Land Mines and Related Devices	Convention on the Prohibition of Anti-Personnel Mines (Ottawa Treaty) (1999); Protocol II, as amended (1998), to the Convention on Certain Conventional Weapons.
Cluster Munitions	Convention on Cluster Munitions (2010)
Nuclear weapons (Non-proliferation)	The Treaty on the Non-Proliferation of Nuclear Weapons

<sup>1</sup> International Committee of the Red Cross, Customary International Law Database, Chapter 20, Rule 70 and 71