

<p style="text-align: center;">Export Control Policy March 2026</p>

Export control forms a key part of the UK Government agenda related to research security, often known as [trusted research](#), which aims to support the safety and integrity of international research collaboration, and protect UK research from theft, exploitation or mis-use.

This policy reflects the University of Glasgow position related to its responsibilities under legislation on export control. As explained in Section 2 below, some exports (defined broadly, physical and non-physical items) may be subject to control in some form, such as risk mitigation activities and/or requirement for an export license

Staff and students are reminded that compliance with legislation is required by government as well as being a component of good research practice. The policy is accompanied by a glossary and articulation of staff and student roles and responsibilities in relation to export control legislation.

Please note, previous versions of this policy incorporated University policy on sanctions. Staff should note that exports to sanctioned countries or individuals have enhanced restrictions and should refer to the [Sanctions Policy](#) for more information.

1. The **purpose** of this policy is to support the University's staff, students, visitors, affiliates, and contractors to comply with export control legislation and provide guidance that applies to University activities.

2. **Background**

- 2.1. [UK Strategic Export Control](#) refers to legislation ([The Export Control Order 2008](#)) that restricts the transfer of certain goods, equipment, materials, software, and technology (including technical assistance, research data, designs, software, and know-how) from the UK to a destination or destinations outside the UK with the aim of protecting national security and preventing conflict, human rights abuse, weapons of mass destruction (WMD) proliferation and terrorism.
- 2.2. The University and its staff, students, visitors, affiliates, and contractors have a responsibility to ensure legal compliance with export control regulations related to activities, whether funded or unfunded, conducted on behalf of the University or as part of University business.
 - 2.2.1. Non-compliance can result in very significant financial penalties and is a serious criminal offence with custodial sentences of up to 10 years, as well as potentially constituting a disciplinary offence. Violations of similar US legislation can also carry severe penalties or result in serious implications in the UK, including fines, revocation of licenses, or criminal penalties.
- 2.3. The laws around export control focus on two categories: (1) goods, software and technology that are specially designed or modified for military use; and (2) goods, software and technology that have a 'dual use' and could be used for both civilian and military applications.

- 2.4. Items and/or technologies are also considered in line with assessments of any end user. That is, where the government views the potential end user of an export to be higher risk, even where the potential for military or dual use may seem limited, the export may be subject to requirements for export control licensing.

3. *Scope*

- 3.1. The policy applies at the University to all its people, including but not limited to staff (including affiliate and honorary staff), students, visiting students and academics, and contractors.
- 3.2. This policy will overlap with other policies as well as additional legislative and/or regulatory requirements and therefore, while this list is not comprehensive, it should be noted that:
 - 3.2.1. Export control considerations also apply to exports that are prohibited by sanctions legislation. Further information about sanctions can be found in the University Sanctions Policy.
 - 3.2.2. Staff or Students may be required to apply for ATAS (Academic Technology Approval Scheme) certificates in relation to entering the UK for work or study. People and Organisational Development (staff) or External Relations and/or International Student Support (students) provide support and advice on the requirements for staff or students joining the University.
 - 3.2.3. The [National Security and Investment Act \(NSIA\)](#) is legislation that is complementary to Export Control requirements in [protecting national security](#). It focuses on investments and acquisitions rather than exports. Staff are encouraged to review the guidance and seek support or more information at an early stage if they suspect that their activities may require [notification](#) to the Government under the Act.
 - 3.2.4. There may be additional regulatory and/or legislative requirements on exports relating, for example, to artworks, cultural goods, animals, plants, medicines, pathogens, radioactive substances, etc. For more information, please contact the Safety and Environmental Protection Service or review the [broader Government guidance](#) on exporting goods.
 - 3.2.5. Travel Safety and Risk Assessment – All individuals should assess the risks related to travel on behalf of the University, mitigating these as needed. Support is available from the Safety and Environmental Protection Service and under the Policy for Business and Study Travel.
 - 3.2.6. Travel Insurance - All individuals should ensure that they are covered by appropriate travel insurance as detailed in the Policy for Business and Study Travel. This is available through the Travel, Risk, Insurance, and Compliance Approval Portal (TRICAP).
 - 3.2.7. IT and Cybersecurity – All individuals should ensure that they adhere to guidance about information security provided by IT Services and all relevant IT policies. This includes securing your information and your devices, including personal devices which interact with university systems or store data relevant to University business.

- 3.3. Individuals are responsible for their own adherence to this policy and for taking reasonable actions to prevent to prevent breaches of the legislation within the scope of their duties and responsibilities.

4. Policy Statement

- 4.1. All individuals identified as being in scope of this policy in 3.1 must make themselves aware of the requirements of the legislation / regulations, how these may apply to them, their work, and/or their area of responsibility, and take appropriate measures to mitigate risks or otherwise comply with the legislation.
 - 4.1.1. Line managers and supervisors should ensure that where export control compliance is relevant that individual responsibilities are clearly communicated.
 - 4.1.2. It should be understood that even the casual exchange of information, items and/or technologies, such as via email or in meetings, could constitute a breach of the export control legislation.
 - 4.1.3. Individuals are expected to act within the scope of their duties and responsibilities in adhering to the policy.
- 4.2. All individuals subject to this policy who are undertaking activities that may be an export or include the export of items and/or technologies must undertake due diligence to understand, record, and/or mitigate the risks related to activities and partnerships which are potentially subject to export controls.
 - 4.2.1. These procedures will vary according to circumstances but may include efforts to undertake training, review and mitigate risks, apply for or comply with licensing, and seek support or guidance from others, e.g. the Finance Office, Research Services/RGIT, research support/operations teams, Legal and Contracts, reviewing funder requirements, reviewing advice from government entities, etc.
 - 4.2.2. Risk mitigation and management might include a broad array of activities that ensure that items and/or technologies are secured and/or are not shared inappropriately or accidentally. This may include adapting processes or adopting internal auditing processes.
 - 4.2.3. Due diligence should be embedded in activities from an early stage rather than only once a project or collaboration is agreed or funded, e.g. when considering invitations to speak internationally, meeting with colleagues or companies representing or working for internationally based entities, meetings colleagues at conferences, drafting proposals for funding, etc.
- 4.3. Activities that have been refused export control licensing or which have been agreed through relevant institutional processes to be unacceptable in the light of the export control legislation will not proceed.
- 4.4. Proposed activities that are subject to export control regulations will not proceed until an appropriate license is first obtained by the individual, and all necessary steps are taken to ensure that its conditions are fully implemented and being monitored.
- 4.5. Any member of the University who becomes aware of or is in receipt of a report of a potential breach of the legislation whether through routine auditing, internal processing or other mechanisms, or via queries from an external source must report it to

- appropriate staff and/or act to mitigate risks of a breach of the legislation. Any issues must be investigated and resolved urgently.
- 4.5.1. If anyone is notified of issues, they should contact their line management, the Research Governance and Integrity Team (RGIT), and their College professional lead for research support/operations (or equivalent) in the first instance.
- 4.6. The strategic decision-making body in the University for Trusted Research matters is the Trusted Research Advisory Group (TRAG) although a number of University and College decision making entities will consider matters that relate to export control. Escalation to TRAG will take place where the decisions are matters of institutional strategy, impact, or risk.
- 4.6.1. TRAG may refer matters to Senior Management Group (SMG) for final decision or recommend that another University policy is more appropriate to deal with specific matters, e.g. disciplinary policies.
- 4.7. Export Control regulations can be more complex than simply the export from the UK of controlled or dual use items and/or technologies. All individuals should seek guidance from RGIT where it is suspected that additional regulations might apply. For example:
- 4.7.1. Foreign nationals who are undertaking activities at the University should be aware that, in addition to UK, US and EU controls, they may also be subject to their home country's export control laws (e.g. India, China) and are responsible for ensuring they comply with these laws.
 - 4.7.2. US Export Controls are extraterritorial and consider certain items and/or technologies to be 'deemed exports', meaning that US export control laws may apply in the UK to items and/or technologies of US origin and some uses or users may be prohibited. Individuals are urged to seek advice from RGIT where this might apply.
- 4.8. The consequences of violations of this policy will be proportionate to the violation. This might include disciplinary action by the University in the most serious cases, including but not limited to where clear guidance from TRAG or other responsible University authorities has been not followed or where activity has been undertaken despite the refusal of a license.
- 4.8.1. It should also be understood that violations of export control legislation are also criminal matters for adjudication by relevant authorities with the potential for fines or custodial sentences.

Appendix 1: Glossary

Dual Use – Dual use items and/or technologies are those which can be used for both civil and military purposes. These are detailed in the UK Strategic Export Control List published by the UK Government.

Export Control Joint Unit (ECJU) - ECJU administers the UK's system of export controls and licensing for military and dual-use items. Contact with ECJU is made only through the Research Governance and Integrity Team.

Export - Export is construed widely and covers: (i) the physical, electronic and verbal transfer of controlled items from within the UK to a destination outside the UK (including within the EU); (ii) the transit of controlled items through the UK; and (iii) the transfer of controlled items within the UK for use in a WMD programme outside the UK (including teaching taking place in the UK). Export of controlled items can occur in a variety of activities such as academic and commercial collaborations, teaching, consultancy and licensing activities and even electronic transfer of data, such as through email, or travelling to a country overseas with a laptop or papers which contain controlled technology.

Items and/or technologies – The policy refers to 'items and/or technologies', but this should be construed broadly and understood to encompass the full range of physical, non-physical goods, technologies, materials, data, software, technical assistance, etc. to which the legislation and government guidance refer.

Research Collaboration and Advice Team (RCAT) - UK Government advice service with dedicated regional teams providing advice to research institutions on the national security risks linked to international research. Contact with RCAT is made only through the Research Governance and Integrity Team.

Research Governance and Integrity Team (RGIT) - Professional team in the Research Services Directorate supporting compliance awareness, providing advice, guidance and training, supporting and coordinating with the Trusted Research Advisory Group, supporting licensing processes, and liaising with and coordinating technical assistance with UK Government entities.

Trusted Research - 'Trusted research' is a phrase widely used in the UK research and innovation sector to refer to activities, processes, systems, guidance, and support that seeks to protect research, intellectual property, people, and infrastructure from potential threats, misuse or exploitation and supports the integrity of international research collaborations. Similar terms are also used interchangeably, such as 'research security' or 'responsible internationalisation'.

Trusted Research Advisory Group (TRAG) - Strategic advisory body for Trusted Research matters within the University. TRAG connects various other decision-making entities such as the Transnational Education Board, International Strategy Deliver Board, and College-level Committees through its membership and escalates decision-making to Senior Management Group (SMG) as needed.

Appendix 2: Roles and Responsibilities

The University has put in place governance, decision-making, advice, guidance and support to help to ensure that staff are supported in understanding what they need to do to remain compliant. Individuals remain responsible for their own conduct in the execution of their roles and the following articulation of roles and responsibilities underscores this and supports compliance with export control legislation for those engaged in University business. The [Code of Good Practice in Research](#) confirms this obligation on all those subject to that policy to observe standards of practice and relevant legislation and guidelines.

1. Governance Roles and Responsibilities

- 1.1. The **University** - The University has put in place policies, processes, risk management and decision-making authority in order to ensure that individuals are supported in understanding their responsibilities and has a responsibility to maintain these.
- 1.2. The **Chief Operating Officer and University Secretary (COO)** has overall responsibility for the University's compliance with export control and is accountable for institutional strategic decision-making, institutional policy related to Trusted Research, and the University's [Export Control Compliance Statement](#).
- 1.3. The **Trusted Research Advisory Group (TRAG)** is responsible for supporting the COO to ensure effective strategic decision making, risk management and mitigation, and policy development through:
 - 1.3.1. Decision-making in respect of any aspect of the University's strategic position and compliance activity related to trusted research and related topics, such as responsible internationalisation and collaboration, and transnational education (TNE).
 - 1.3.2. Case review where decision making is sensitive, complex, has strategic impact, and/or requiring input from multiple actors or entities across the University.
 - 1.3.3. Identifying, assessing, and mitigating risk related to trusted research and related topics, including defining risk appetite and managing risk exposure to the University.
 - 1.3.4. Overseeing internal or external audits or requests for information related to trusted research, export controls, or the National Security and Investment Act.
 - 1.3.5. Reviewing any trusted research-related policies.
 - 1.3.6. Liaising with other University committees, such as the TNE Board or Senior Management Group (SMG), to ensure consultation and decision making is taking place in the most appropriate venue.
- 1.4. The **Transnational Education (TNE) Board** is responsible for the following in relation to export control regulations:
 - 1.4.1. Ensuring that decisions in respect of the University's TNE partnerships are compliant with export control regulations or legislation, and institutional policies, or able to be made so.
 - 1.4.2. Ensuring that export control matters and relevant risks are considered on an ongoing basis in relation to all TNE matters.
 - 1.4.3. Communicating/collaborating with TRAG and RGIT regarding concerns or decisions related to TNE partnerships.

- 1.5. The Research Governance, Policy, and Integrity (RGPI) portfolio in the Research Services Directorate (RSD), and in particular the **Research Governance and Integrity Team (RGIT)** are responsible for:
 - 1.5.1. Developing, maintaining and managing institutional policies, guidance, communications, and procedures in respect of compliance and assurance mechanisms relating to export control legislation and requirements;
 - 1.5.2. Working with TRAG to support University decision and risk management with respect to trusted research;
 - 1.5.3. Providing advice on compliance with legal and regulatory requirements relating to controlled activities;
 - 1.5.4. Providing advice and support to staff in identifying whether export control issues arise in relation to their activities and, if so, providing support in determining the appropriate compliance route or risk mitigation actions, and support in following appropriate legal procedures, including obtaining licenses and/or registering projects where required;
 - 1.5.5. Developing and delivering appropriate targeted training to researchers and colleagues whose activities might be subject to export control legislation or requirements;
 - 1.5.6. Engaging with internal and external audits or requests for information relating to export control compliance requirements, working with researchers or other colleagues to address any identified non-compliance, as required;
 - 1.5.7. Working in collaboration with University colleagues to contribute to due diligence processes and checks on international partners from a trusted research compliance perspective. This may include, for example, conducting end-user checks, providing advice or signposting to resources, coordinating advice from RCAT or ECJU, and/or tabling cases for TRAG assessment.
 - 1.5.8. Acting as institutional “authorised users” on dedicated government systems (e.g. LITE) on behalf of the university to administer license applications to ECJU and undertake checks on behalf of researchers.
 - 1.5.9. Managing the institutional relationship with RCAT / ECJU as named contacts. All contact with RCAT and ECJU must be made via RGIT.
- 1.6. The **Legal & Contracts Team** within the Legal and Governance team, part of the University Court Office, is responsible for ensuring that:
 - 1.6.1. A reasonable effort is made to establish whether export controls apply when working through contract negotiation and drafting with colleagues;
 - 1.6.2. Colleagues are signposted to RGIT for advice or support as needed during any contract drafting or negotiation process;
 - 1.6.3. Contracts within their remit include provisions, where appropriate, requiring all parties to comply with applicable export controls and sanctions, ensuring, insofar as possible, appropriate protections for the University.
- 1.7. **Academic Policy and Governance** (APG), part of Student and Academic Services, are, in the context of trusted research, responsible for:
 - 1.7.1. managing transnational education (TNE) partnerships;
 - 1.7.2. providing advice and guidance to assist colleagues to ensure that TNE partnerships and resultant activity comply with export control regulations;

- 1.7.3. liaising as required with RGIT and TRAG to support the provision of advice and guidance and support decision-making process;
- 1.7.4. supporting effective risk assessment, mitigation and management and associated record-keeping.

2. Staff Roles and Responsibilities

- 2.1. **Strategic Leaders, including Heads of College, Deans of Research, and Heads of School** are responsible for:
 - 2.1.1. Maintaining an awareness of trusted research risks in their Colleges or Schools and implementing appropriate measures to ensure compliance and appropriate risk management and mitigation.
 - 2.1.2. Understanding export control regulations and relevant internal policies as they apply to their research areas and/or organisational units, supporting compliance or audit activities, and supporting investigations into any suspected non-compliance;
 - 2.1.3. Supporting awareness raising to ensure that individuals in their Colleges or Schools are made aware of and undertake the training available, particularly in identified high-risk areas of research.
 - 2.1.4. Considering export control regulations when developing international partnerships whether related to research or teaching;
- 2.2. **Research Leaders, Principal Investigators (PIs), and line managers** are responsible for, as appropriate to their roles:
 - 2.2.1. Understanding export controls regulations and relevant internal policies and procedures as they apply to their research areas, disciplines, operations, and organisational units and ensuring understanding and compliance policy and processes are embedded in their teams;
 - 2.2.2. Supporting staff within their line management to understand their obligations, supporting compliance or audit activities, and/or supporting investigations into any suspected non-compliance;
 - 2.2.3. Maintaining an awareness of compliance risk and implementing appropriate measures to ensure appropriate risk management and mitigation is in place.
 - 2.2.4. Seeking advice from the RGIT via the Helpdesk if they suspect that export controls may apply to their work.
 - 2.2.5. Obtaining export control licenses where these are required in connection with activities relating to projects for which they lead or are PI, ensuring that all members of their team(s) understand and comply with export control regulations, including keeping accurate records of risk assessment and mitigation and associated records.
 - 2.2.6. Providing complete and accurate information on project partners and activities, including unfunded projects to relevant internal parties to assist with compliance activities or with audit activities.
- 2.3. **Staff, including researchers, LTS staff, and Professional Staff** (where relevant to their roles) and postgraduate researchers (PGRs) should ensure that they:

- 2.3.1. Have read and understood this Export Control Policy and any associated guidance and understand whether their research area(s) and/or collaborative partners or collaborators may be subject to export control legislation;
 - 2.3.2. Seek advice from RGIT via the Helpdesk if they suspect that export controls may apply to their work.
 - 2.3.3. Comply with export control regulations related to their research or their roles, including developing any required local policy or process, keeping accurate records of risk assessment and/or mitigation actions, and any other associated records;
 - 2.3.4. Do not engage in any activity for which an export control license is required without confirming that a license has been obtained for that activity;
 - 2.3.5. Undertake due diligence on new partners and support internal due diligence processes, taking advice as needed and sharing, as needed, with professional services such as Legal and Contracts, or research support/operations teams;
 - 2.3.6. Provide accurate information for license applications and make best efforts on the Goods Checker or other existing guidance to determine the applicability of the export control legislation;
 - 2.3.7. Comply with any risk management requirements;
 - 2.3.8. Consider export control regulations when engaging with international partners and colleagues whether related to research or teaching.
3. A number of **specialist roles** exist within the University which may be relevant for export control compliance and advice, including:
- 3.1.1. **Supervisors and advisers of PGRs** should support PGRs to understand and comply with this policy and export control regulations.
 - 3.1.2. **Graduate Schools** are responsible for ensuring relevant processes and checks are in place relating to PGRs and visiting PGRs and for liaising with RGIT as needed to develop and enhance relevant processes.
 - 3.1.3. **Line managers** of all staff are responsible for ensuring that those whom they manage are supported to comply with export control regulations and engage with relevant training.
 - 3.1.4. **Research Professionals** undertake a variety of specialist roles in relation to research at the University, including the full lifecycle of grant management, and should understand how trusted research compliance and risk mitigation is relevant in their roles, supporting the implementation of appropriate due diligence, systems, policies or processes as needed. Colleges each have research offices or teams who lead on support for this activity.
 - 3.1.5. **Technical Staff** undertake a variety of specialist roles and should seek to understand how trusted research compliance and risk mitigation is relevant in their roles, supporting the implementation of appropriate due diligence, systems, policies or processes as needed.
4. A number of **University Services** exist within the University to support colleagues with international collaborations and travel:

- 4.1.1. **External Relations** lead many of the University's strategic internationalisation activities, including the development and management of partnerships and formal collaborations. They are also responsible for student recruitment, applications, and admissions.
- 4.1.2. **Finance Office, Insurance Section** – Provides details and support related to University insurance policies. Travel insurance is available through the Travel, Risk, Insurance, Compliance and Approval Portal (TRICAP).
- 4.1.3. **International Student Support** – Provides support to students applying to the Academic Technology Approval Scheme (ATAS).
- 4.1.4. **IT Services** – Provides advice, guidance, and support related to information security, including securing your devices and data and staying secure while travelling. Local IT support teams can provide advice or access to clean devices to ensure secure travel.
- 4.1.5. **People and Organisational Development (POD)**: Provide advice and guidance about global mobility and ATAS requirements for staff.
- 4.1.6. **Safety and Environmental Protection Service** provide guidance and training on occupational health and safety and environmental legislative compliance matters across the University. Specifically, they can provide specialist advice about specific risks, e.g. biological or chemical safety, and travel advice and risk assessment.

Are you aware of the Export Control Regulations?

No

Training /Support is needed:

[Website](#)
[Training](#)

Have you considered who your partner is:
[Red Flags Partner Due Diligence](#)

Yes

Will you be transferring items and/or technologies physically, electronically, or verbally to collaborators or 3rd parties outside the UK?

No

No further action required but [training](#) is recommended if not previously completed. Ensure [partner due diligence](#) is appropriate.

Yes

If the answer is yes to any of the following:

- Have any items and/or technologies been transferred already?
- Is the item and/or technology specifically designed for military use?
- Do you have any reason to believe that the items and/or technologies have potential to support the design, development, production, stockpiling, or use of chemical or biological weapons?

Yes

Get further advice:

[Helpdesk](#) (ask the team for support)

No

Is it possible that the item is 'dual use', i.e. a non-military item that may be used for military or security purposes? Review the [Strategic Export Control](#) lists to confirm prior to contacting team.

Yes

Yes, restriction applies

No

Have you checked that the destination/recipient for the items and/or technologies is not subject to a trade restriction?

- Review [sanctions list](#) prior to contacting team.
- Consider undertaking due diligence on any partner.

No restriction

No further action required but [training](#) is recommended if not previously completed.