

QUEEN'S UNIVERSITY BELFAST

Due Diligence Framework

1. Introduction

- 1.1 This document sets out the University approach to the due diligence checks required to provide assurance to research Funders and senior managers that risk assessment for undertaking research in, and sub-contracting with third party organisations has been completed and deemed acceptable.
- 1.2 The focus of this document is primarily funder mandated due diligence and does not include the desktop due diligence that is undertaken, proportionate with risk, for other University matters.

2. Background

- 2.1 Many funders now include specific requirements in their terms and conditions regarding the need to conduct due diligence on any third parties/subcontractors of the award, usually prior to the commencement of any project activity. Examples of such funders that may request this include, but are not limited to, UKRI, NIHR, FCDO etc.
- 2.2 This funder mandated due diligence usually requires the use of a questionnaire to provide assurance around such items as:
 - Governance & Internal Control
 - Ability to Deliver
 - Financial Stability
 - Sub-contractor & Collaborator Management
 - IP Management
- 2.3 This guidance is based upon UKRI's recommendations regarding the practice of due diligence for project partners.
- 2.4 The principles within this document will be used as guidance for due diligence requirements by other funding bodies e.g. FCDO (Foreign Commonwealth & Development Office), NIHR (National Institute for Health Research), AMS (Academy of Medical Sciences) etc. However, any particular due diligence requirements by other bodies will be taken into account on a case-by-case basis e.g. specific questionnaire etc.

3. Due Diligence Principles

- 3.1 Due diligence involves undertaking reasonable checks to:
- a) Ensure that each project is compliant with Funder guidelines;
 - b) Identify and mitigate the risks associated with undertaking research with other partners;
 - c) Assess if a collaborating organisation has the capacity and expertise in place to carry out the required research;
 - d) Ensure that a collaborating organisation has policies, procedures and systems of control to enable the research to be conducted to the required standards;
 - e) Ensure due consideration has been given to any potential trusted research implications.
- 3.2 Due Diligence Framework at Queen’s requires the completion of a range of reasonable checks that identify and assess key risks. The objective is to determine if the overall level of risk is acceptable for the project to proceed. Review includes assessment of potential reputational risk to the University. Consideration will also be given to potential national security concerns e.g. unethical or dual use of project information and/or outputs. Appendix 2 illustrates non-financial risk factors that will be considered when assessing the project.
- 3.3 National Protective Security Authority (NPSA) defines Trusted Research as “aims to support the integrity of the system of international research collaboration, which is vital to the continued success of the UK's research and innovation sector.” Investigators and academics are strongly encouraged to review this resource to determine the impact upon their own research. Further reading and resources on this issue can be found in the [Trusted Research Guidance for Academia](#).
- 3.4 The underlying principle of due diligence is not to create barriers to collaboration but to provide assurance to the academic, university and funder regarding the appropriate consideration of risk and application of mitigations where appropriate.
- 3.5 For activities that are identified as ‘high risk’ following review, the Framework details an escalation route to senior management (Appendix 3).
- 3.6 Queen’s operates a three-stage due diligence process in-line with UKRI recommendations. See Table 1 below.

Table 1: Three-Stage Due Diligence Process

Application Checks	<ul style="list-style-type: none"> • Initial sanctions checks within RAS (EU/UK & US). • Reminder to PI to consider Trusted Research principles.
Award Checks	<ul style="list-style-type: none"> • Desktop Due Diligence • Internal PI Questionnaire • Institutional Partner Questionnaire (where appropriate) • Partner Project Due Diligence (where appropriate)
Award Monitoring	<ul style="list-style-type: none"> • Review of desktop due diligence • Internal PI questionnaire

4. Due Diligence Questionnaire Selection

- 4.1 Given that a key funder of research awards within the University is UKRI, the questionnaire selection process documented within this guidance is based on the UKRI questionnaires.
- 4.2 This guidance allows for flexibility should any additional funder specify particular due diligence or the use of a specific questionnaire.
- 4.3 The mechanism to determine the appropriate partner due diligence questionnaire is captured in Appendix 4. These questionnaires will be based on the template of those questionnaires located on UKRI website.

5. Due Diligence Process Overview

- 5.1 The Due Diligence team rely on correspondence from such parties as Research Contracts, Faculty Finance and researchers to identify those projects that require completion of partner questionnaires. The Due Diligence team will not routinely review funder offer letters, correspondence or funder terms and conditions.
- 5.2 Further specialised support and guidance on the due diligence process can be obtained by contacting the Due Diligence team at due_diligence@qub.ac.uk.
- 5.3 Information on this Framework and process is also available on the Queen’s website.

- 5.4 The Due Diligence team will support the Principal Investigator and partner organisations with completion of the due diligence paperwork, confirm that the necessary due diligence checks have been undertaken and the risk is confirmed as acceptable.
- 5.5 If the partner organisation has undergone due diligence checks within the last three years, generally there is no requirement to repeat the institutional due diligence questionnaire. However, this does not prevent due diligence being reviewed on these partner organisations within this timeframe if there should be any issues or change in circumstances which could give rise to concerns. If a working relationship with a partner organisation should exceed three years, the need to revisit/repeat due diligence will be discussed internally.
- 5.6 Whilst Queen's reserve the right to not request institutional partner due diligence questionnaires to be completed within 3 years (dependent upon type/level of questionnaire completed), this does not apply to project specific due diligence. As funder mandated, this will be required for all projects.
- 5.7 It is Queen's position, in line with UKRI terms and conditions, that due diligence must be complete on all partners/collaborators within the award, including partner questionnaires where relevant, prior to finalisation of research collaboration agreement.
- 5.8 Where a partner/collaborator does not receive funds from Queen's University Belfast directly, due diligence will primarily consist of desktop only. However, we reserve the right to request a partner complete a questionnaire should significant risks be identified or funder requirements dictate this.

6. Due Diligence Procedure

6.1 Application Stage

- 6.1.1 Queen's utilises an electronic system to manage the workflow and approval of research applications. Automatic sanction checks of named partners/collaborators has been incorporated into this system. These include selected UK, EU and US sanction lists.
- 6.1.2 Following positive identification of a sanctioned entity, the PI is encouraged to liaise with R&E Directorate to investigate this further.
- 6.1.3 Within the University's electronic Research Application System the PI is reminded to consider Trusted Research principles at this application stage.
- 6.1.4 If necessary, potential issues identified at this stage may be escalated as illustrated in Appendix 3.

6.2 Award/Contract Stage

- 6.2.1 Upon confirmation of award via parties listed in 5.1 the Due Diligence team will undertake a range of proportionate desktop due diligence checks. These may include

the use of a third-party due diligence tool, manual sanction checks, additional adverse media review and additional country/subject specific resources.

- 6.2.2 Internal PIs will be asked to complete a form at grant award stage containing the following information (Appendix 5):
- a) Confirmation of all partners on award and level of funding,
 - b) Awareness of key internal policies/procedures/processes and/or legislations.
 - c) Assessment of Trusted Research implications for the project.

Please note, regardless of funder terms and conditions, Queen's reserves the right to request an internal PI form be completed by any QUB researcher involved in a research project/collaboration agreement.

- 6.2.3 In accordance with funder instructions, project partners/collaborators will receive an appropriate questionnaire for completion. The Due Diligence team will prepare the appropriate questionnaire(s) and share with internal PI.
- 6.2.4 In recognition of existing relationships between internal and external researchers/academics, the Queen's PI is tasked with ensuring the appropriate questionnaires are dispatched to all relevant partners/collaborators.
- 6.2.5 Due diligence colleagues within Research Governance are happy to assist the external partners in completing the questionnaire or addressing any queries that may arise.
- 6.2.6 Please note, this procedure does allow for additional information not listed on the UKRI forms to be requested from either partner or PI, should the funder and/or Queen's require any specific information. As such the forms can be amended if deemed necessary to meet the demands of the particular project or funder.
- 6.2.7 Due diligence (desktop and questionnaire) review will be undertaken by appropriate experienced colleagues in Research Governance and/or Research Development team.
- 6.2.8 In the spirit of equitable partnerships this procedure will generally apply to all collaborators included in funder mandated grants. Due to the potential nuance amongst funder requirements, Queen's reserves the right to use judgment at this point.
- 6.2.9 Following the review of all Award/Contract stage due diligence checks, should one or more high risks be identified, the Due Diligence team will escalate the matter as illustrated in Appendix 3. It is recognised that when considering these high-level risks, additional input may be required from specialist advisors.
- 6.2.10 If concerns are escalated to the appropriate Deans of Research/Internationalisation or Global Risk Committee (GRC) for consideration, they have the options to:
- a) Approve the risk(s) as acceptable and recommend that the relationship with the partner organisation proceeds;
 - b) Recommend the relationship with the partner organisation following implementation of appropriate mitigations to reduce the risk(s);

- c) Conclude that the risk is unacceptably high.

6.3 Award Monitoring

- 6.3.1 In recognition of both the changing geopolitical landscape that HEIs are navigating and the recommendation by UKRI, periodic checks will be undertaken on the project throughout the duration of its lifetime.
- 6.3.2 The typical frequency of these post-award checks is documented within Appendix 6. Please note, if deemed appropriate the frequency of these checks may be increased if significant risks are identified at outset of award.
- 6.3.3 Due Diligence colleagues will provide the Award Monitoring Form (Appendix 7) to the internal PI for completion at the required review period (s). Please note, regardless of funder terms and conditions, Queen's reserves the right to request completion of an award monitoring form to be completed by any QUB researcher involved in a research project/collaboration agreement.
- 6.3.4 The review will be performed by Due Diligence colleagues within Research Governance and/or Research Development. If necessary, additional Professional Services colleagues may be consulted e.g. Research Finance, Research Contract etc.
- 6.3.5 For instances where the Principal Investigator and/or Professional Services have concerns about non-compliance, an initial assessment of the risk will be made. If necessary, appropriate mitigation measures may be introduced to reduce identified risks. Where necessary, concerns may be escalated via the route illustrated in Appendix 3 to determine the appropriate action(s).
- 6.3.6 In instances, where following escalation, the risk is deemed unacceptably high, the recommendation may be made to terminate the sub-contract. In such circumstances, the Principal Investigator will be informed. The decision to terminate a sub-contract will be approved by the PVC Research and Enterprise.
- 6.3.7 The Contracts Team will issue the legal notice of termination to the partner including information on the process.
- 6.3.8 The impact of the termination of a sub-contract on the overall project will be discussed with the Principal Investigator and every effort made to continue with the project.
- 6.3.9 The Funder of the project will also be informed of the decision to terminate a sub-contract including a summary of the reasons. Where the recommendation of the Funder is to continue with the project, it will be the responsibility of the Principal Investigator to liaise with the Funder on this, following standard Funder procedures, on making changes to a project.

List of Appendices:

Appendix 1: Due Diligence Overview Flowchart

Appendix 2: Non-Financial Risk Factors for Consideration

Appendix 3: Illustration of Escalation Route

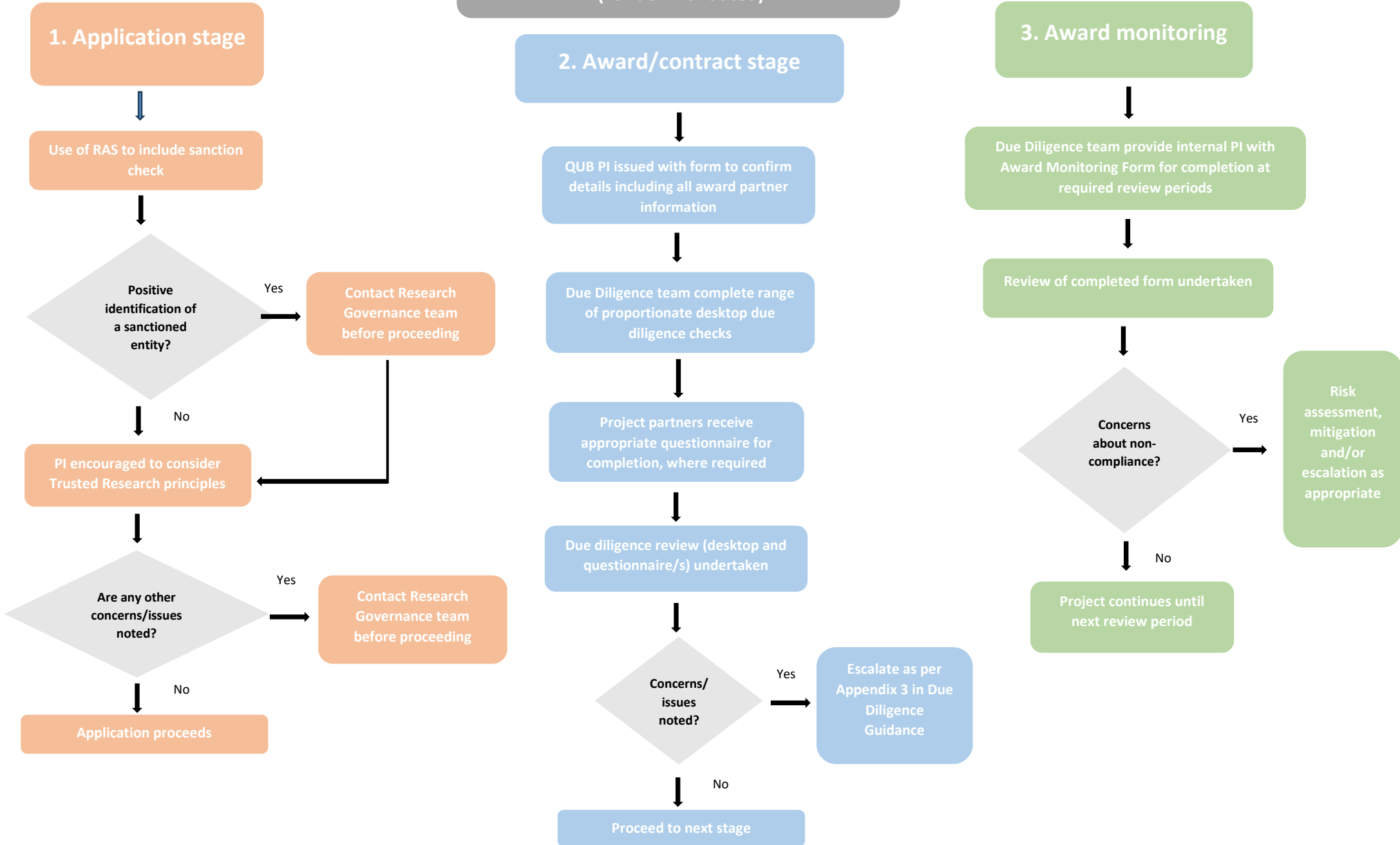
Appendix 4: Flowchart for Selection of Due Diligence Questionnaire

Appendix 5: Internal PI Form – Award Stage

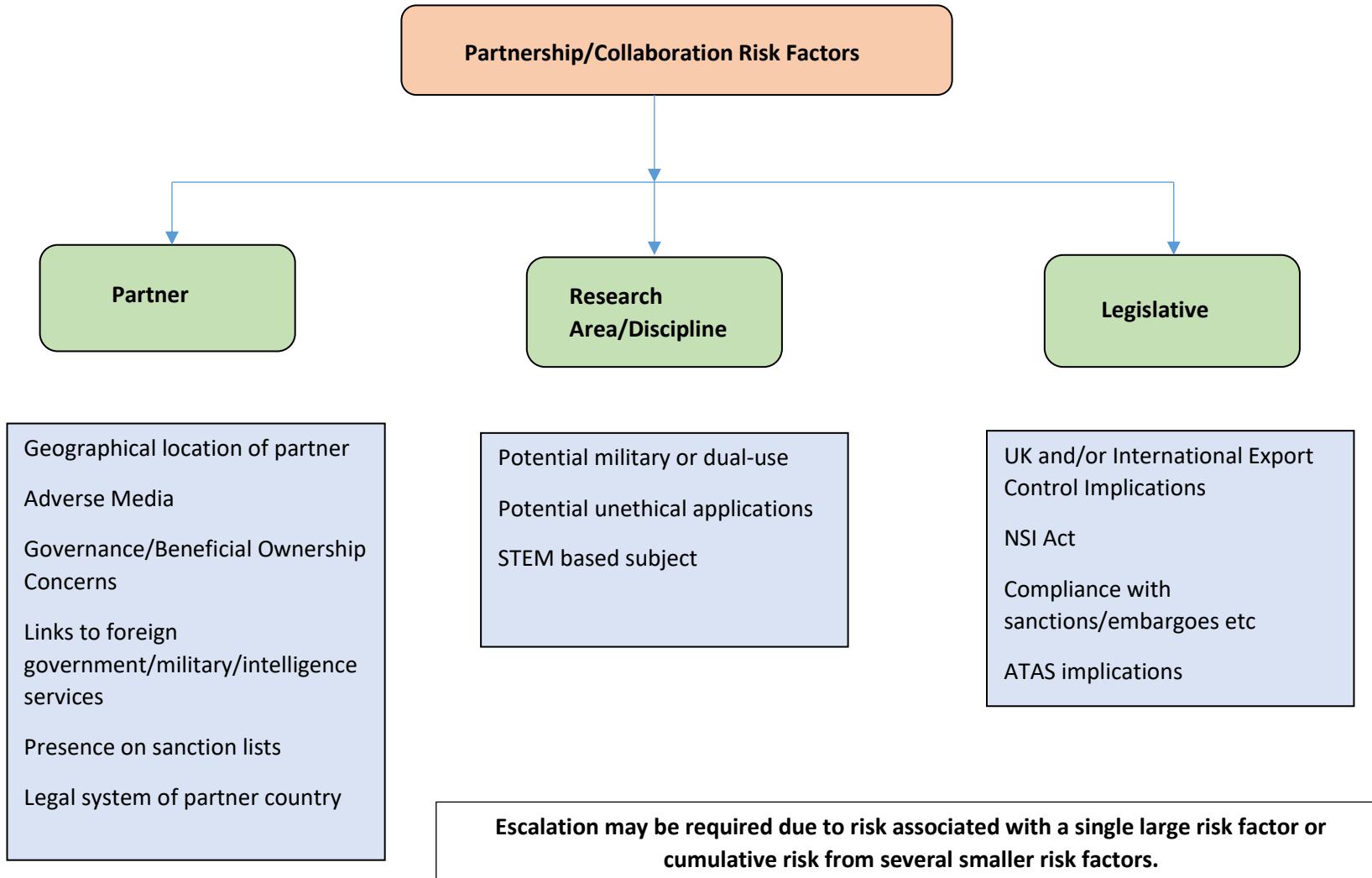
Appendix 6: Rubric for Determination of Due Diligence Review Period

Appendix 7: Award Monitoring Form (Internal PI)

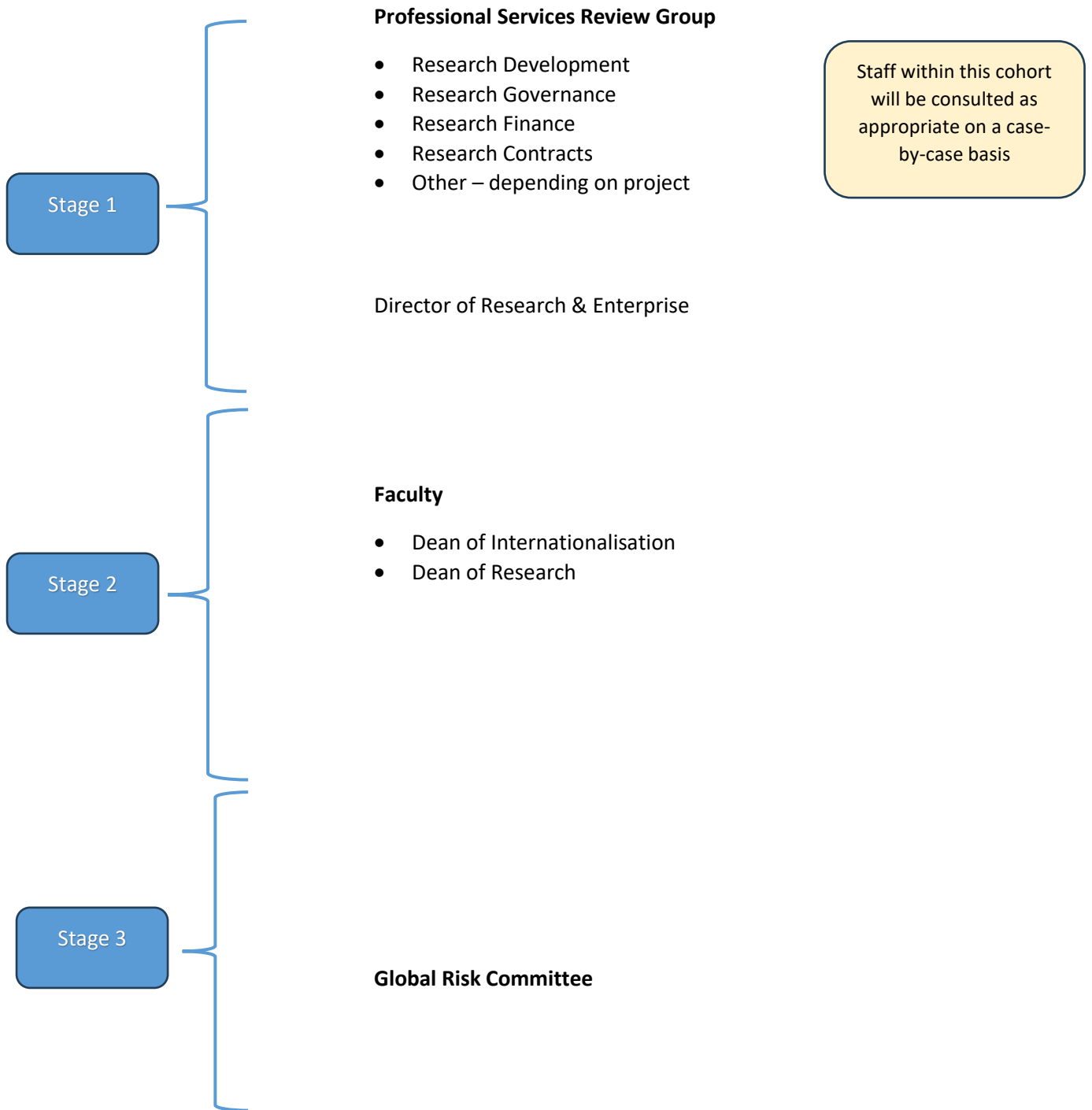
APPENDIX 1: Due Diligence Overview flowchart



APPENDIX 2: Non-Financial Risk Factors for Consideration

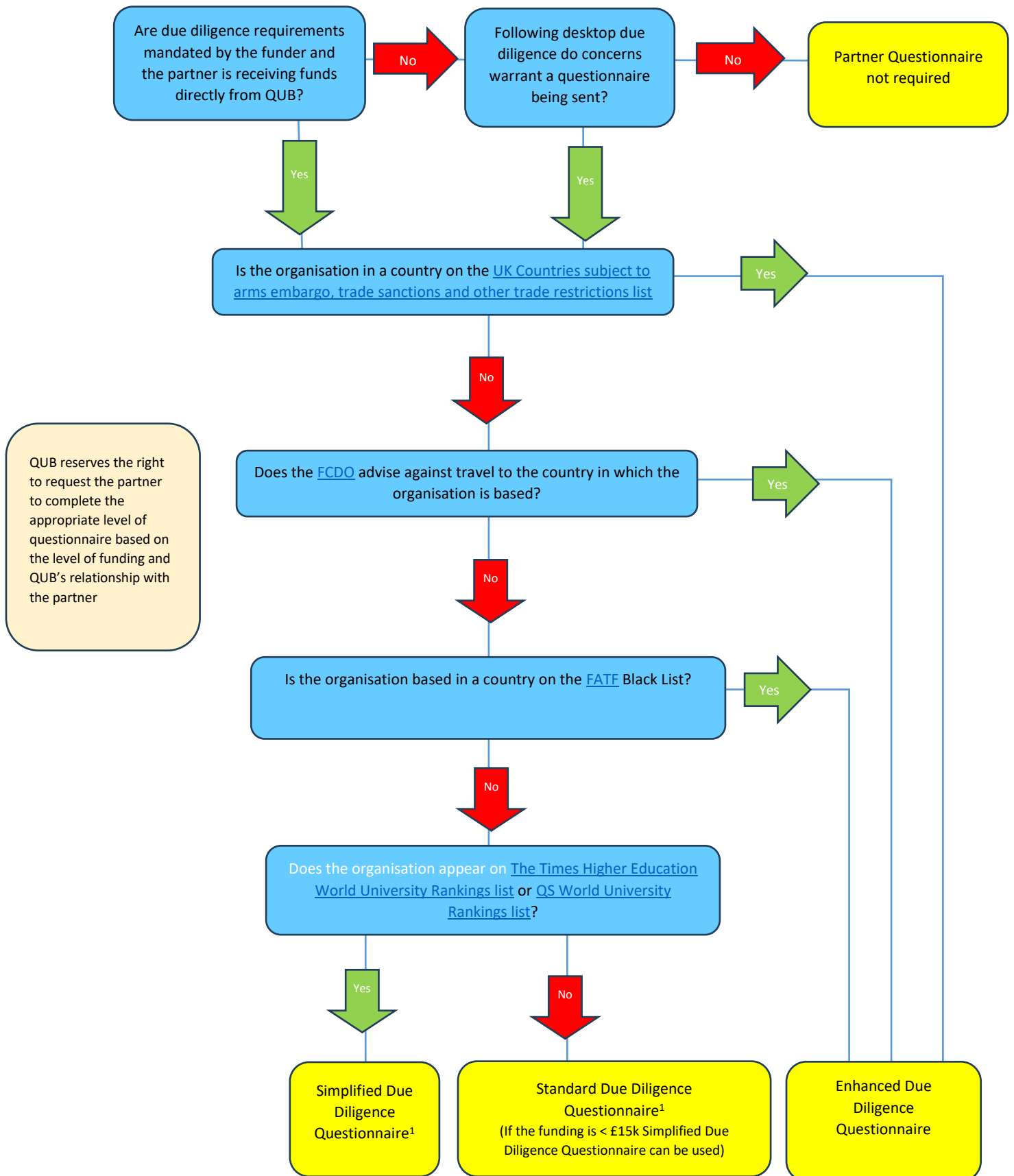


Escalation Route



Matters deemed to be of the highest risk can be directly escalated to Stage 3

APPENDIX 4: Flowchart for Selection of Due Diligence Questionnaire



¹ If Due Diligence has been carried out on the organisation at the same level in the past 3 years there is no requirement to request the full institutional questionnaire unless there is any particular concern or reason to revisit due diligence e.g. change in geopolitical landscape. Project only questionnaire will be sent.

APPENDIX 5: Internal PI Form – Award Stage



QUB PI Form (Award Stage)

Partner Information

This form must be completed in full by the Principal Investigator and returned to the email address due_diligence@qub.ac.uk as soon as possible. The information will be used to enable Professional Services to undertake the required checks. This process will be supported by the Research Development and Research Governance teams.

1. Project Summary

Project Title	Click or tap here to enter text.
Project Duration	Click or tap here to enter text.
QUB Principal Investigator	Click or tap here to enter text.
QUB School	Click or tap here to enter text.
Funding Organisation	Click or tap here to enter text.
Funding Programme and Call Title	Click or tap here to enter text.
Total Award Value Requested from Funder	Currency: Click or tap here to enter text. Value: Click or tap here to enter text.

<p>If applicable to the project terms and conditions, please confirm that this project is ODA (Official Development Assistance) compliant and will remain so for its duration.</p> <p>Official development assistance (ODA) - OECD</p> <p>If ODA compliance is not required for this project by the funder, please state N/A</p>	Yes	N/A
	<input type="checkbox"/>	<input type="checkbox"/>

2. Partner Overview

Number of partners	
Lead Institution/ Partner	

Please add details of all your partners below regardless of whether they will be receiving funding. (Please add additional rows to capture all partners if necessary).

Partner Name	Name of Primary Contact	Email	Amount to be transferred (GBP)	Website	Legal Address	Country

Partner Name	Name of Primary Contact	Email	Amount to be transferred (GBP)	Website	Legal Address	Country

Have you collaborated previously with any of these partners?	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
Have any issues arisen while working with any of the partners on previous projects which have given you cause for concern with regard to trusted research issues?	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
Are you aware of any issues of transferring funds to these partners?	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
Are there any conflict of interests with QUB staff participating in this project? Please refer to QUB policy for guidance.	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
Do these partners intend to subcontract any project activities?	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
If you have answered 'yes' to any of the above questions please provide details below:		

3. Internal Policies/Processes and Procedures/ External Legislation

- Travel Insurance
<https://www.qub.ac.uk/directorates/FinanceDirectorate/visitors/insurance/travel-insurance/>
- Travel Policy
[QUB Travel Policy](#)
- Research in Conflict Zones
<https://www.qub.ac.uk/Research/Governance-ethics-and-integrity/FileStore/Filetoupload,961273,en.pdf>
- Safeguarding children and adults at risk
[Policies & Procedures to Comply With | People and Culture | Queen's University Belfast \(qub.ac.uk\)](#)
- Preventing Harm (Safeguarding) In Research and Innovation Activities
<https://www.qub.ac.uk/Research/Governance-ethics-and-integrity/SafeguardinginResearch/>
- Research ethics and integrity
[Policies, procedures and guidelines | Research | Queen's University Belfast \(qub.ac.uk\)](#)
- Bullying and Harassment
<https://www.qub.ac.uk/directorates/HumanResources/diversity-and-inclusion/policies-procedures-and-guidance/>
- Nagoya Protocol
<https://www.gov.uk/guidance/abs>
- Export Control Policy
[Filetoupload,1405381,en.pdf \(qub.ac.uk\)](#)
- National Security and Investment (NSI) Act
[National Security and Investment Act: guidance for the higher education and research-intensive sectors - GOV.UK \(www.gov.uk\)](#)

Any queries in respect of the above policies should be directed to the relevant internal team.

Please confirm that you are aware of all the above internal policies/procedures/processes/ external legislation and will take any action prior to commencing the project to ensure compliance, where necessary, with any of the above.

Yes

4. Trusted Research

National Protective Security Authority (NPSA) defines Trusted Research as follows. *“Trusted Research aims to support the integrity of the system of international research collaboration, which is vital to the continued success of the UK’s research and innovation sector. It is particularly relevant to researchers in STEM subjects, dual-use technologies, emerging technologies and commercially sensitive research areas. ... and is designed to help the UK’s world-leading research and innovation sector get the most out of international scientific collaboration whilst protecting intellectual property, sensitive research and personal information”.*

For further information and resources on Trusted Research please refer to the [National Protective Security Authority](#) website. All academics and investigators are strongly encouraged to review this resource.

With a particular focus on Trusted Research risk, please answer the questions below. To help frame your responses, please consider the following questions.

- Could your research be used to support activities in other countries with ethical standards different from our own, such as internal surveillance and repression?
- Could your research be of benefit to a hostile state military or be supplied to other hostile state actors?
- Are there any dual-use (both military and non-military) applications to your research?
- Is any of the research likely to be subject to [UK](#) or other countries’ export licence controls?
- Do you need to protect sensitive data or personally identifiable information? This may include genetic or medical information, population datasets, details of individuals or commercial test data.
- Is your research likely to have a future commercial or patentable outcome which you or your organisation would want to benefit from?
- Is there any implication in relation to the [National Security and Investment \(NSI\) Act](#) for your research?

Taking into account the proposed discipline/area of research (including associated partners if cross disciplinary) and the potential risk associated with this area/research/activity.

Please document notes on the following:

- 1) Risk discussion
- 2) Recommended Risk Mitigations (if appropriate)

<p>With a particular focus on the area/discipline of your research, please review any legislative implications with your proposal e.g. export control, NSI Act etc. As part of this review, please document notes on the following:</p> <ol style="list-style-type: none"> 1) Risk discussion 2) Recommended Risk Mitigations (if appropriate) 	
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6. Declaration

This form should be signed by the Principal Investigator when completed and returned to due_diligence@gub.ac.uk

All of the information provided on this form is accurate.

Name of Principal Investigator	Job Title
Click or tap here to enter text.	Click or tap here to enter text.
Signature	Date
	Click or tap here to enter text.

FOR QUB GOVERNANCE USE ONLY

Form Reviewed by	
Name	
Job Title	
Date	
Comments:	

APPENDIX 6: Rubric for Determination of Due Diligence Review (Post Award)



This appendix will indicate the due diligence review periods for post award projects.

Length of Project	No of Due Diligence Review Points (Exc Finance)
0 -24M	2 (Middle and end of project)
24M +	Every 12 months

APPENDIX 7: Award Monitoring Form



Award Monitoring Due Diligence Review

This form should be completed by the Principal Investigator in full. For further guidance or queries please contact the Due Diligence team at

due_diligence@qub.ac.uk.

1. Project Summary

Project Title	Click or tap here to enter text.
QUB Principal Investigator	Click or tap here to enter text.
QUB School	Click or tap here to enter text.
Funding Organisation	Click or tap here to enter text.
Funding Programme and Call Title	Click or tap here to enter text.
Partner Organisation 1:	Click or tap here to enter text.
Partner Organisation 2:	Click or tap here to enter text.
Partner Organisation 3:	Click or tap here to enter text.
Partner Organisation 4:	Click or tap here to enter text.

2. Post Award Review

<p>Please confirm your continued awareness of, and where appropriate to your project, compliance with the following policies/procedures/processes and legislation:</p> <ul style="list-style-type: none"> • Travel Insurance: https://www.qub.ac.uk/directorates/FinanceDirectorate/visitors/insurance/travel-insurance/ • Travel Policy: QUB Travel Policy • Research in Conflict Zones https://www.qub.ac.uk/Research/Governance-ethics-and-integrity/FileStore/Filetoupload,961273,en.pdf • Safeguarding children and adults at risk Policies & Procedures to Comply With People and Culture Queen's University Belfast (qub.ac.uk) • Preventing Harm (Safeguarding) In Research and Innovation Activities https://www.qub.ac.uk/Research/Governance-ethics-and-integrity/SafeguardinginResearch/ • Research ethics and integrity Policies, procedures and guidelines Research Queen's University Belfast (qub.ac.uk) • Bullying and Harassment https://www.qub.ac.uk/directorates/HumanResources/diversity-and-inclusion/policies-procedures-and-guidance/ • Nagoya Protocol https://www.gov.uk/guidance/abs • Trusted Research https://www.npsa.gov.uk/trusted-research-academia • Export Control Policy Filetoupload,1405381,en.pdf (qub.ac.uk) 	<p>Yes No</p> <p><input type="checkbox"/> <input type="checkbox"/></p>	<p>If relevant, please add an additional supporting statement here regarding your response. This may include, but is not limited to, any concerns that you may have regarding the project.</p> <p>Click or tap here to enter text.</p>
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<ul style="list-style-type: none"> National Security and Investment (NSI) Act National Security and Investment Act: guidance for the higher education and research-intensive sectors - GOV.UK (www.gov.uk) 										
<p>At this review period, I confirm that the project remains ODA-compliant. Please complete this question if your project relates to ODA funds. If it does not, please tick 'not applicable' (N/A).</p>	<table border="0"> <tr> <td>Yes</td> <td>No</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td></td> <td>N/A</td> </tr> <tr> <td></td> <td><input type="checkbox"/></td> </tr> </table>	Yes	No	<input type="checkbox"/>	<input type="checkbox"/>		N/A		<input type="checkbox"/>	<p>Click or tap here to enter text.</p>
Yes	No									
<input type="checkbox"/>	<input type="checkbox"/>									
	N/A									
	<input type="checkbox"/>									

3. Declaration

All of the information provided on this form is accurate.

Name of Principal Investigator	Job Title
Click or tap here to enter text.	Click or tap here to enter text.
Signature	Date
	Click or tap here to enter text.

FOR QUB GOVERNANCE USE ONLY

Form Reviewed by	
Name	
Job Title	
Date	
Comments:	