

Interim International Sanctions Compliance Guidelines

Section 1 - Context/Overview

(1) These Guidelines support the University's commitment to compliance with the legislation referred to in the International Sanctions Compliance Policy and provide a basis for decision making on an interim basis while the procedure is finalised, as well as establishing a working group for collaboration to develop robust, useable and meaningful procedures.

Section 2 - Guidelines

Notifications

(2) Upon endorsement by the Executive Committee the interim Policy and these Guidelines, the Vice-Chancellor will cause a copy of those documents to be sent to all Divisions and Colleges, calling on the Divisions and Colleges to raise awareness of compliance internally, and to seek assistance of Governance where necessary.

Due Diligence and Documentation on an Interim Basis

(3) Until such time as the Policy is in final form and approved by Council, any aspect of the University's activities which involves persons from sanctioned countries, designated persons or entities, export of sanctioned goods and sanctioned services, in particular those named at clause 12 of the [Interim International Sanctions Compliance Policy](#), shall be approached with awareness of the Policy.

(4) All decisions made where issues of compliance with the Policy are raised should be documented by a minimum standard of a file note outlining what risks were highlighted and how they were mitigated/considered.

Establishing a Working Group

(5) In order to establish appropriate procedure that is simple, effective and compliance based across all of the business units impacted by the Policy, a working group will be established, facilitated by Council Services & Chancellery, to aid in the development of procedure and guidelines.

(6) As a minimum a representative from:

- a. Global Engagement and Partnerships Division;
- b. Graduate Research;
- c. Research and Innovation Services;
- d. Academic Division; and
- e. Office of the Vice-Chancellor (Human Resource Services) shall form part of the working group.

(7) In order to ensure appropriate stakeholder engagement, a representative from:

a. the College of Engineering, Science and Environment will be asked to form a part of the working group.

(8) To ensure no stakeholder is overlooked the details of the first meeting of the working group will be published in an email to all staff, requesting nominations of representatives to be forwarded to Governance for consideration for inclusion.

Reporting to Executive Committee

(9) The working group will report to the Executive Committee at dates being proximate to 3, 6 and 12 months from the date of endorsement of the interim Policy, and at any other times where input and direction from the Executive Committee is called for.

Interim Use of Forms

(10) Each division or college impacted by the Policy may, in the interim period and until formal procedures and guidelines are agreed to, roll out interim forms and processes on a trial basis.

(11) Should any form be used by any division or college, the working group should be advised and provided with electronic copies of the documents, and should be updated with any feedback provided in relation to the use of the forms, including ease of use, effectiveness of guiding decision making, and comprehensive nature.

Status and Details

Status	Current
Effective Date	9th July 2015
Review Date	31st December 2019
Approval Authority	Vice-Chancellor
Approval Date	16th October 2013
Expiry Date	Not Applicable
Responsible Executive	Zee Upton Deputy Vice-Chancellor (Research and Innovation)
Enquiries Contact	

Glossary Terms and Definitions

"Council" - The governing authority of the University established under section 8A of the University of Newcastle Act 1989.

"Risk" - Effect of uncertainty on objectives. Note: An effect is a deviation from the expected, whether it is positive and/or negative.

"College" - An organisational unit established within the University by the Council.