



# National Security Guidelines for Research Partnerships Update of the Risk Assessment Form

**March 24, 2023**

Innovation, Science and Economic Development (ISED) Canada, in consultation with the federal granting agencies and the national security departments and agencies, updated the Risk Assessment Form (RAF). The new RAF has also been informed by the results of the survey on the implementation of the National Security Guidelines for Research Partnerships (Guidelines) conducted by the U15 Group of Canadian Research Universities and Universities Canada in summer 2022.

On March 24, 2023, the updated RAF was posted on the Safeguarding Your Research portal. This updated version of the form now replaces the initial one.

The purpose of this document is to outline the main changes made to streamline the form and improve its clarity and ease of use.

## Objectives of the form

The main objective of the RAF remains to collect information on national security considerations that pertain to an applicant's proposed research project and prospective research partners. These two indicators are taken into account throughout the Guidelines assessment process, which is intended to evaluate an application's overall risk profile.

Several references to the objectives of the RAF have been added throughout the form, and language has been integrated to describe how the information collected is used in the risk assessment process.

The updated RAF remains a general form that can be utilized across all relevant research partnership funding opportunities.

## Section 1 “Know Your Research”

The questions in this section have been streamlined and rephrased for greater clarity. Additional information was added to help applicants complete each question and to reduce the need for them to refer to separate documents or pieces of legislation. In addition:

- Questions were re-ordered so that the indicator-specific questions (i.e., reference to existing lists) come first and the reference to the sensitive research list in Annex A of the Guidelines comes last.
- The following two questions were removed:



- “The research knowledge or intellectual property (IP) generated by this research could be of interest to foreign governments, militaries, or their proxies.”
- “The field of research has potential military, policing, or intelligence applications, even if that is not your intended use for it.”
- The question on sensitive personal data and large amounts of data were split into two new questions (i.e., questions 1.3 and 1.4).
- The question on the research facilities and infrastructure was removed.

### **Export and Import Permits Act**

- The updated RAF includes one question in section 1 “Know Your Research” to determine if the research area is related to goods or technology that are included on the *Export Control List* of the *Export and Import Permits Act* (EIPA).
- The other questions about import/export/controlled good lists and the section “Know your EIPA obligations” were removed.

### **Section 2 “Know Your Partner Organization”**

The same approach as for section 1 was taken to provide additional text to clarify the intent of each question to better support applicants.

- The first question about the affiliations that could lead to the transfer of research was removed. This information was instead integrated into the description of the new question 2.1 to state that a partnership subject to foreign influence, interference or control could facilitate unwanted knowledge transfer in a manner that could harm Canada's national security.
- The second question about if the partner organization could be subject to foreign influence or control was rephrased and additional information with the description in italic was included for greater clarity.
- The question “Your partner organization has been charged, admitted guilt, or has been convicted of fraud, bribery, espionage, corruption, or other criminal acts that could speak to a lack of transparency or ethical behaviour.” was revised and included as an indicator to the new question 2.2.
  - The description for question 2.2 clarifies that applicants should search for events within the last five years was added.
- The following two questions for which there is no possible mitigation measures were removed and integrated into the new section 5 “Additional Requirements”.
  - “There is an offer of funding where the ultimate source of the money and/or value to the funder is unclear.”
  - “There is an offer of funding which is conditional upon the researcher transferring to or replicating their work in a foreign country (e.g., setting up a mirror lab).”
- The wording of this question was clarified to give more explanation: “There is information to suggest that conflicts of interest or affiliations exist for any research



team members that could lead to transfer of research to third party governments, militaries, or other organizations.” See the new question 2.3.

- This question was rephrased to provide more information: “Your partner organization will have access to Canadian facilities, networks, or assets for conducting the research unrelated to this specific partnership.” See the new question 2.4.
- The question on the Area Control List was removed.

### **Section 3 “Risk Identification” and Section 4 “Risk Mitigation Plan”**

The new RAF confirms that the risk identification and risk mitigation plan are required for whenever there is a “yes” or “unsure” in section 1 **and** section 2 to reflect the objective of enhancing research security in general. Risk mitigation measures are required even if there are no risks with the partner, but the research could still be a target.

For the section “Risk Mitigation Plan”, additional guidance was included to the effect that:

- It's not sufficient for applicants to refer to existing or upcoming policies and practices within their institution, they must also describe what this policy or practice entails and how it will be applied to mitigate the identified risks, and
- Excluding any individual from participating in the proposed research project on the basis of their citizenship or country of residence is not an acceptable risk mitigation measure.

The information on risk mitigation was removed from the new RAF, and it is now presented on a new webpage on the Safeguarding Your Research portal.

### **Section 5 “Additional Requirements”**

A new section was added to address two questions from section 2 of the original RAF that have no possible mitigation measures.

### **Risk Assessment Process**

The appendices A “Overview of the Process” and B “Process flow chart” of the original RAF were removed from the new form. This information was updated and is now presented in a new webpage of the Safeguarding Your Research portal.

### **Annex A of the National Security Guidelines for Research Partnerships – Sensitive Research Areas**

To more easily hyperlink to sections of Annex A within the Risk Assessment Form, the list of sensitive and dual-use research areas and sensitive personal data have been integrated into two distinct tables in the Annex.