Defence Export Controls Policy

Section 1 - Preamble

(1) Charles Darwin University ('the University', 'CDU') commits to excellence in its research activities and sets a high bar for quality standards, processes, and outcomes.

(2) The University is committed to complying with Australian export controls and export laws.

Section 2 - Purpose

(3) This policy outlines the University's management of the export of defence and strategic goods, technology and software from Australia in compliance with the Defence Trade Controls Act 2012.

Section 3 - Scope

(4) This policy applies to all employees of the University, all research students, and anyone who conducts research under the auspices of the University.

Section 4 - Policy

(5) The export from Australia of defence and strategic goods, technology and software listed on the Defence and Strategic Goods List is regulated by export control laws.

(6) The University complies with all Australian export controls and export laws and ensures that employees, research students, or anyone who conducts research under the auspices of the University are aware of their obligations in accordance with the relevant legislation and will comply with export controls.

Employee and research student obligations

(7) Employees, research students, and anyone undertaking research under the auspices of the University are responsible for ensuring that they comply with the requirements of the Defence Trade Controls Act 2012 and the Customs Act 1901.

(8) Individual compliance responsibility rests with the employee. Employees who work with Defence and Strategic Goods List goods and technology must actively recognise their compliance obligations.

(9) Employees and research students must:

a. determine whether or not their research falls within the scope of the Defence Trade Controls Act 2012 or the Customs Act 1901 using online or other Defence Export Controls resources. Certain exemptions may apply for the kinds of research conducted in the University;
b. advise the Deputy Vice-Chancellor Research and Community Connection if their research falls within the scope of the Defence Trade Controls Act 2012 or the Customs Act 1901 and is not exempt;

c. seek advice from the Deputy Vice-Chancellor Research and Community Connection if they have any doubt about the application of the Defence Export Controls resources; and
d. create and keep all required records of work with dual-use goods and technology, including work conducted under a permit.

University obligations

(10) The University supports its employees and research students to meet their compliance responsibilities by maintaining a compliance framework. This includes:

a. the Deputy Vice-Chancellor Research and Community Connection monitoring compliance at the University;
b. communicating compliance obligations via a website and otherwise;
c. supporting employees and research students in the self-assessment of their research;
d. keeping appropriate records of work relating to dual-use goods and Defence and Strategic Goods List technology; and
e. liaising with the Defence Export Controls when required, including requests for permits.

Section 5 - Non-Compliance

(11) Non-compliance with Governance Documents is considered a breach of the Code of Conduct – Staff or the Code of Conduct – Students, as applicable, and is treated seriously by the University. Reports of concerns about non-compliance will be managed in accordance with the applicable disciplinary procedures outlined in the Charles Darwin University and Union Enterprise Agreement 2025 and the Code of Conduct – Students.

(12) Complaints may be raised in accordance with the Complaints and Grievance Policy and Procedure - Employees and Complaints Policy - Students.

(13) All employees have an individual responsibility to raise any suspicion, allegation or report of fraud or corruption in accordance with the Fraud and Corruption Control Policy and Whistleblower Reporting (Improper Conduct) Procedure.

Status and Details

Status	Current
Effective Date	10th January 2024
Review Date	10th January 2027
Approval Authority	Vice-Chancellor
Approval Date	9th January 2024
Expiry Date	Not Applicable
Responsible Executive	Steve Rogers Deputy Vice-Chancellor Research and Community Connection +61 8 89466890
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