

Export Controls Compliance Statement

From: University Executive Board

Date: November 2020

1. EXPORT CONTROLS AND ACADEMIC COMMUNITY

Export controls are measure adopted by governments around the world to restrict the export of certain categories of goods, sensitive technology, software and services in order to prevent misuse of conventional weapons, illegitimate development and proliferation of Weapons of Mass Destruction (WMD), and to counter international threats such as terrorism. Other reasons for controls include security, foreign policy and international treaty commitments (e.g. United Nations trade sanctions or arms embargoes).

Export control is a complex regulatory area which applies to Universities and academics in the same way as to any other person or organisation involved in activities subject to the controls. Most academic research is basic science, or relates to public domain information, and is therefore exempt from export control laws. However, some of the academic knowledge, goods used, or activities conducted by researchers have the potential to be misused and may be restricted. Controls are most likely to apply in certain disciplines including nuclear physics, biological sciences, chemistry, mechanical engineering, electronics, aerospace and computing.

In the UK, exports of strategic goods and any licences required are administered by the **Export Control Joint Unit** (ECJU).

Some international students enrolled on certain UK advanced courses need to be certified via the **Academic Technology Approval Scheme** (ATAS).

2. UNIVERSITY COMMITMENT TO EXPORT CONTROL COMPLIANCE

The mission of the University of Southampton ('the University') is to change the world for the better, by pushing the frontiers of knowledge for the global good of humankind, and ensuring that all research conducted under the auspices of the University is undertaken in line with relevant legislation, guidance and ethical principles.

The University understands the importance of export control compliance, takes our responsibilities seriously and is strongly committed to complying with all relevant national and international export control laws, regulations and procedures.

Our commitment to export controls compliance includes:

- Adherence to the ECJU's Code of Practice.
- Promoting awareness, knowledge and understanding of export control regimes within our academic community.
- Developing clear export control policies and effective procedures and processes including appropriate record keeping and internal audit arrangements.
- Providing advice and training to support our researchers and the research process.
- Ensuring that all necessary licences are applied for prior to exporting any controlled goods or technology, and that any licences we hold are correctly used in line with their terms and conditions.
- Keeping up to date with evolving legislation and relevant regulations.

3. OVERALL RESPONSIBILITY

The Vice-President (Research and Enterprise) has the overall responsibility for the export control compliance at the University of Southampton. The following groups and committees support The Vice-President on matters relating to export controls:

- Research and Enterprise Executive Group (REEG)
- Research Integrity and Governance Committee (RIGC)

It is however the responsibility of individual researchers to be aware of and comply with export control laws and the University's policies and procedures as per section 4 below.

In the UK failure to adhere to export control obligations is a criminal offence and can lead to financial penalties for both the individuals concerned and the University, legal costs, reputational damage for the University, and even imprisonment.

4. INDIVIDUAL RESPONSIBILITIES

The University expects all researchers to recognise that they are personally responsible for their research practice, and to conduct high quality research in accordance with national and international legislation, relevant guidance, ethical and research integrity principles, as well as professional standards relevant to their area of research.

All researchers (including students engaged in research), particularly those in scientific and engineering disciplines, and relevant professional staff should be aware of, understand and comply with export control regulations, including applying for relevant licences, observing their terms and conditions, and maintaining records of all controlled activities for as long as required by law.

Researchers need to be aware that controls can cover not only tangible goods, but also software, data, technology and know-how. In addition, export can take place via physical or electronic transfer (including by phone, text messaging, e-mail, fax or other electronic media), as well as transfer by other means (which may include verbal communication).

5. FURTHER INFORMATION

Further information on export control regulations and compliance is available at:

- [RIG SharePoint site](#) (internal only).
- University of Southampton [Code of Conduct for Research](#)
- Export Control Joint Unit (ECJU) [website](#).
- [Academic Technology Approval Scheme \(ATAS\)](#)

Guidance documents:

- [Export Control Compliance Code of Practice](#)
- [Guidance on export control legislation for academics and researchers in the UK](#)
- [Higher Education Guide and Toolkit on Export Controls and the ATAS Student Vetting Scheme](#)

6. VERSION CONTROL

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1.0	N/A	No previous versions.	University Executive Board (UEB)