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Griffith Submission to the Parliamentary Joint Committee on Intelligence and Security (PICIS) Inquiry into national security risks affecting the Australian higher education and research sector

Thank you for the opportunity to make a submission to the Parliamentary Joint Committee on Intelligence and Security Inquiry into National Security Risks affecting the Australian higher education and research sector.

Context of 2020

The impact of COVID-19 upon the University sector is unprecedented and unparalleled. The challenges and uncertainty have caused major disruptions to the University sector in 2020 and this uncertainty is set to continue in 2021 and beyond. We face a challenge of achieving the University's mission given the constraints of significantly reduced income streams. In these circumstances of reduced resources, it is critical that universities be able to focus on core teaching, learning and research without the burden of unnecessary and disproportionate regulatory burdens that divert important resources.

Griffith recognises that national security risks are a critical consideration and that robust mechanisms need to be in place to manage and mitigate against the risk of undue foreign influence and interference. Such mechanisms are likely to work best if they are coordinated and focused.

We propose that the University Foreign Interference Taskforce (UFIT) is the appropriate body to provide assurance in this regard; this mechanism works well and in particular recognises the specific context of the university sector.

The Value of International Collaborations for Australia's Universities

International collaboration is central to Australia's research excellence and international research collaborations enable a diverse, rich and nuanced set of engagements that support Australia's long-term national interests. Partnerships with international universities and other internationally based organisations are highly beneficial to Australian universities and to our broader society.

International collaborations ensure that Australian researchers have access to the best equipment, talent and ideas from around the world. Many major breakthroughs are the result of international collaborations and partnerships. Griffith's work on a COVID-19 vaccine, for example, has been undertaken in partnership with an Indian vaccine manufacturer Indian Immunologicals Ltd, providing strong production and scale-up capabilities, distribution networks to over fifty countries and well-established links with WHO. Another such example is our Centre of Excellence established in conjunction with our German partners, the Fraunhofer Institute for Toxicology and Experimental Medicine and Hannover Medical School. The Centre aims to develop new anti-infective drugs to combat respiratory viruses including influenza viruses. In circumstances in which research funding is likely to be depleted in Australia in coming years, it will be even more important for Australian researchers to be able to benefit from research infrastructure and expertise overseas.

An aligned approach to foreign influence legislation

Universities are subject to significant legislative requirements relating to the issues under investigation of this inquiry. Griffith has strong reservations that a fragmented approach with duplicate responsibilities across multiple government departments would result in unnecessary bureaucracy and cost.

Griffith is currently bound by a significant array of laws and guidance related to the topics covered by this inquiry, including several new laws introduced in recent years or currently under consideration. These include (but are not limited to):

- Defence Trade Controls Act 2012
- Autonomous Sanctions Act 2011
- Foreign Influence Transparency Scheme Act (the FITS Act) 2018
- Foreign Relations (State and Territory Arrangements) Act 2020
- Security Legislation Amendment (Critical Infrastructure) Bill 2020
- University Foreign Interference Taskforce (UFIT) Guidelines
- Commonwealth Integrity Commission Bill 2020
- TEQSA's Higher Education Integrity Unit.

Approach to foreign influence

Universities spent considerable time and effort in 2019 working with key government agencies on the Universities Foreign Interference Taskforce (UFIT) to establish world-leading guidelines around cyber security and intellectual property. A strong collaboration between government agencies and universities therefore already exists and UFIT has successfully developed best practice guidelines to counter foreign interference in Australian universities. A renewed UFIT forum would be an appropriate mechanism of identifying and proposing actions with respect to further national security gaps that relate to universities.

In response to the Department of Education, Skills and Employment released guidelines to Counter Foreign Interference in the Australian University Sector on 14 November 2019, Griffith has been actively engaged in managing and monitoring risk areas relating to potential undue foreign influence and interference. Our primary focus remains on ensuring that we have fit-for-purpose governance, processes and capabilities to appropriately and proportionately manage any inherent risks in our diverse international engagements to best ensure that the local and national benefits of these relationships and collaborations can continue to be realised.

We have established a cross institutional working group and a high-level assessment has been undertaken of our activities with international collaborators, including research grants, commercial engagements, technology transfers, donations and international partnerships.

Griffith is focused on incorporating Countering Foreign Interference risk management into our existing relevant frameworks. The goal is to ensure a robust approach to reduce vulnerabilities and mitigating foreign interference threats to the University's people, information and assets; this also serves to protect the reputations of individuals and the institution and to maintain strong partnerships.

Universities already have policies, frameworks, systems and processes to ensure a positive security culture, enabled by robust communication, practices and due diligence. The integration of foreign interference risks in existing risk frameworks, policies and procedures promotes a strong security culture and avoids unnecessary duplication.

In summary

Griffith notes that foreign engagements may present a risk to Australian universities; however, we believe that the vast majority have no national security implications. We therefore strongly advocate for fit-for-purpose governance, processes and capabilities to appropriately and proportionately manage the inherent risks of our diverse international collaborations.

There are many layers of assurance already in place and many Australian government departments and agencies engaged with ensuring the compliance of universities. Adding further additional regulation and new lines of accountability is more likely to lead to fragmentation, confusion and duplication.

Griffith therefore advocates and recommends:

- The Government should consider a more holistic approach to these issues and work with universities through existing channels to fix any apparent gaps in its risk framework.
- That UFIT is regarded as the primary mechanism to bolster the defences of Australian universities against foreign interference. A renewed UFIT forum, potentially with deeper expertise around specific threats, would serve as the vehicle for identifying and fixing any further national security gaps that relate to universities, and a more effective response to those issues than the imposition of further regulations.
- The Government publish a clear, overarching foreign influence and interference strategy across all of government, mapping out where the various pieces of legislation sit within that framework to support a more workable and proportionate response.

COVID-19 has renewed our determination to ensure that the University is future-focused and able to meet post COVID-19 challenges, so that we can play our part in the economic recovery of Queensland and the nation. We have significant reservations that additional regulation would fundamentally impact and stifle Griffith's ability to be responsive in seeking new avenues for growth and research impact. The implications are profound and bring additional complexity and uncertainty to a sector that is already facing profound challenges.

Yours sincerely

A solid black rectangular box redacting the signature of Professor Carolyn Evans.

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