Vastuullinen kansainvälisyys – Responsible international collaboration

Johanna Krappe,
Head of RDI & Global Engagement
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Tutkimus-turvallisuus ja Avoin TKIO

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Agenda

- Terminologiaa. Mistä me puhumme, kun puhumme tutkimusturvallisuudesta?
- Tavoitteet ja haasteet
- Esimerkkejä eurooppalaisista ja kansallisista yhteisöistä
- Työkaluja avuksi
- Keskustelu

Vastuullisella kansainvälisyydellä tarkoitetaan mm.
- tutkimuksen turvallisuutta,
- turvallista opiskelijoiden ja henkilökunnan rekrytointia,
- turvallista liikkuvuutta
- sekä muita toimia, joissa on suojattava ihmisiä, tietoa tai tiloja.

Kukin toimija ottaa vastuun kansainvälisestä yhteistyöstään ja toiminnastaan rajoittamatta akateemisen vapauden periaatetta, korkeakoulujen autonomian mukaisesti.

Tutkimusturvallisuus ja korkeakoulutuksen kansainvälisyys ovat tasapainoilua vapauksien ja vastuunkannon välillä.

Responsible international collaboration includes
- research security,
- safe recruitment of students and staff,
- safe mobility
- and other activities where we need to protect people, information or facilities.

Each actor takes responsibility for its international cooperation and activities without prejudice to the principle of academic freedom, in accordance with the autonomy of higher education institutions.

Research security and internationalisation of higher education are a balancing act between freedom and responsibility.

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Are we talking about the same thing here?

Terminology: International security, foreign influence, responsible international collaboration, research security, trusted research, due diligence….

Common aim: to facilitate international collaboration in a safe way.

Incorrect assumptions:
- that this is to block certain types of research or working with certain partners.
- it is limited only to certain disciplines or very specific areas of research.

Hurdles:
- Different terminologies and definitions across the international sector
- Limited understanding of due diligence

Recommendations from the Ministry of Education and Culture

OKM:n hallinnonalan toimijat (korkeakoulut, ministeriö, virastot)
- **vahvistavat tietoisuuttaan ja ymmärrystään,**
- **toimivat riskien hallitsemiseksi,**
- **laativat organisaatiokohtaiset linjaukset,**
- **edistävät EU:n suosituksia mm. osana visiotyötä ja**
- **vahvistavat vastuullista kansainvälisyyttä kv-yhteistyöverkostoissa.**

Vastuullista kansainvälisyyttä seurataan osana sektorin ja OKM:n vuoropuhelua ja ohjausprosessia.

The actors of the Ministry's administrative sector (HEIs, ministry, agencies)
- strengthen their awareness and understanding,
- work to manage risks,
- draw up organisation-specific policies,
- promote EU recommendations, e.g. as part of vision work, and
- strengthen responsible internationalism in international cooperation networks.

Responsible internationalisation will be monitored as part of the dialogue and steering process between the sector and the Ministry.

Recommendation

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To achieve the aim of *facilitating international collaboration in a safe way* we need to:

Make an assessment on how best to work or collaborate with that person or organisation within **an acceptable risk framework**.

To do this we need to gather objective and reliable critical facts and descriptive information which are most relevant to making of an informed decision relating to the people, the organisation(s) or company(s) that you may work with.

Why does research security matter?

- Ability to deliver and provide a return investment in the form of new knowledge

- Protecting your research and IP is important to you and your organisation.

- It may be in an area critical to the economic growth of the country.

- Joint research is vulnerable to misuse by organisations and institutions whose values are different to our own.

- Your funders may require it. (note: Research Council of Finland, U.S.)

Challenges

- Very volatile situation in geopolitics

- Universities can primarily be reactive – always trying to catch up

- Lack of solid tools by authorities to help support research security in a broad sense

- Authorities are not equipped to deal with universities

- Not a level playing field in Europe – The EU Commission need to step up and act much faster

Community Status in Europe

EECARO (European Export Control Association for Research Organisations)

- 121 members from 52 member institutions across Europe
- In close contact with **AUECO** in the US and **HEECA** in the UK plus **the EU Commission**
- Not only focus on export control but also has working groups on Emerging Technologies, Internal Compliance Programme and Technical Assistance / Intangible Technology Transfer.
- The go-to organisation for operational expertise.

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EUROPEAN ASSOCIATION OF
RESEARCH MANAGERS AND ADMINISTRATORS

Denmark – three levels of national cooperation between all Danish universities

Danish National Research Foundation
Danmarks Grundforskningsfond

1. **Security in international research and innovation collaboration - URIS-guidelines.** National set of generic guidelines with 4 focus areas

2. **Ad hoc group** – finds consensus on the overall positions on political / general issues

3.1 **Practitioner group** – shares experiences and practices at the operational level.
3.2 **Background Screening Group** – shares experiences and practices in relation to screening of individuals.
3.3 **Defining and mapping Critical Research** based on the EU Commission list.
3.4 **Catalogue of research security cases at Danish universities**.

UK Research & Innovation (UKRI)

Export Control Joint Unit

Universities UK

Higher Education Export Control Association (HEECA)

ARMA UK

Universities UK International

National Cyber Security Centre

Research Collaboration Advice Team

Academic Technology Approval Scheme

Foreign, Commonwealth and Development Office

National Protective Security Authority (NPSA) *formally* Centre for the Protection of National Infrastructure (CPNI)

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INORMS Congress Madrid 2025

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Finnish Universities of Applied Sciences

National collaboration between
- Ministry of Education and Culture,
- universities and research organisations,
- SUPO (Finnish security and intelligence service) and
- Minisry of Foreign Affairs' Dual use & export control unit.
- Finn-ARMA has its own working group.

In ARENE workshops among RDI Directors and Vice Rectors for Research with security managers' network. Working with very imaginative cases / scenarios to raise awareness and build a joint to do list.

Luettavaa ja työkaluja: USA + Kanada

- https://research.mit.edu/document/research-security-and-compliance-discussion-guide
- https://globalsupport.mit.edu/project-planning/international-project-roadmap/
- https://research.osu.edu/research-responsibilities-and-compliance/conflict-interest/foreign-talent-programs
- https://utexas.app.box.com/s/vimyql589sf3ii9vgbf3ltuagcsd9dc9
- https://research.osu.edu/research-responsibilities-and-compliance/conflict-interest/foreign-talent-programs
- https://globalsupport.mit.edu/managing-project-risk/elevated-risk-project-review-process/
- https://www.bis.doc.gov/index.php/regulations/commerce-control-list-ccl
- https://research.utexas.edu/resources/research-integrity-and-compliance/export-control
- https://asce.tamus.edu/resources/
- https://www.nist.gov/adlp/research-security-program
- https://research.utoronto.ca/media/1211/download?inline
- https://research.utoronto.ca/media/1210/download?inline
- https://www.state.gov/countries-of-particular-concern-special-watch-list-countries-entities-of-particular-concern/
- https://www.defense.gov/News/Releases/Release/Article/3844699/dod-releases-updated-list-of-foreign-institutions-engaging-in-problematic-activ/

Luettavaa: Eurooppa

https://ufm.dk/publikationer/2022/afrapportering-udvalg-om-retningslinjer-for-internationalt-forsknings-og-innovationssamarbejde

Free tool funded by EU and operated with University of Liege. Link: https://knowledge4policy.ec.europa.eu/text-mining/tim-dual-use_en

TIM database

Text mining tool comparing scientific publications, patents and EU funded projects of all researchers with EU dual use control list and list of emerging technologies.

Search by institution or individuals.

First mapping to find hotspots when it comes to identifying possible challenges in export control and cooperation with problematic countries, institutions or individuals.

Good starting point for discussions with researchers and departments, because of the concrete results to relate to. The results show where it would be worth doing extra checks.

The EU Commission will add the EU list of Critical Technologies to the database plus other sources.

Esimerkki: University of Michigan

Policy

In accordance with federal requirements, the University of Michigan [U-M] prohibits participation in malign foreign talent recruitment programs. Per the CHIPS and Science Act of 2022, the term "malign foreign talent recruitment program" means:

"(A) any program, position, or activity that includes compensation in the form of cash, in-kind compensation, including research funding, promised future compensation, complimentary foreign travel, things of non de minimis value, honorific titles, career advancement opportunities, or other types of remuneration or consideration directly provided by a foreign country at any level (national, provincial, or local) or their designee, or an entity based in, funded by, or affiliated with a foreign country, whether or not directly sponsored by the foreign country, to the targeted individual, whether directly or indirectly stated in the arrangement, contract, or other documentation at issue. in exchange for the individual—

Esimerkki: Northwestern University

Overview: The federal government has ongoing concerns about Improper Foreign Influence and Malign Foreign Talent Recruitment Programs with respect to research. This document provides brief guidelines for disclosure of foreign interests and best practices in future and ongoing research activities.

- **What do you need to disclose in your Northwestern Conflict of Interest disclosure?**
    - All foreign and domestic Significant Financial Interests (e.g., payments, equity, reimbursed travel);
    - All external positions and appointments (e.g., board service, visiting or honorary appointments);
    - Any participation in a foreign talent recruitment program, malign or otherwise.

  Disclosure is required in eDisclosure within 30 days of acquiring or becoming aware of a new relationship or financial interest. More information can be found in the Policy on Conflict of Interest in Research.

- **What do you need to disclose to funding agencies?**
    - All foreign and domestic academic, professional, and institutional positions and appointments

Esimerkki: Northwestern University

1.

Are you being paid or receiving any form of compensation (i.e. recognition, awards, money, funding, reimbursement, land, etc.) from a country other than the US (including the promise of future compensation of any kind?

2.

Is the program from China, Iran, Russia, or North Korea?

3. Contact export control if you..

- Recruit others (trainees, researchers, speakers, etc.) to participate in a talent program with a foreign entity.

- Hold a position, an appointment,* a laboratory, or a company in a foreign country

- Engage in a contract/agreement where termination is not an option or is difficult

- Unauthorized transfer of (IP) intellectual property), materials, data, or other nonpublic information

- Engage in work for or in another country that overlaps with U.S. Federal dollars

- Apply for or receive funding from a sponsoring foreign entity where you did NOT engage Sponsored Research

- Omit a recipient affiliation, or being told/required to make ommisions

- Conceal program participation in any way

*Simply holding a position or appointment does not constitute a "malign" talent program but if it's with a country of concern it maybe problematic

Hyvä käytäntö: Turun AMK:n tutkimusturvallisuuden työryhmä

Työryhmän tehtävänä on
- kehittää toimintatavat, prosessit ja ohjeistukset tutkimusturvallisuuden varmistamiseksi sekä vienti-pakotelainsäädännön noudattamiseksi organisaatiossa ja
- huolehtia edellytykset myös puolustus- ja turvallisuusprojektien hakemiseen ja toteuttamiseen.

Työryhmä edistää mm. TKI-toiminnan tila-, tieto-, matkustus- ja henkilöturvallisuutta ja kansainvälisen yhteistyön turvallisuutta.

Työryhmä / Working Group 2025-2026:
Johanna Krappe (Head of RDI & Global Engagement)
Päivi Mattila (turvallisuustutkimus, hybridiuhkien asiantuntija)
Jari Niemelä (Senior Legal Counsel, hankinnat, compliance, sopimukset)
Ralf Strandell (IT, tiedonhallinta, tietoturva)
Janne Sundqvist (turvallisuuspäällikkö, ml. viranomaisyhteistyö, henkilö- ja matkustusturvallisuus)
Mirva Virtanen (HR)
Paula Ailio (Projektitoimisto, RMA).

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General Observations

Communiations and Relationship Management

- Look for effective communication strategies unique to your institution and audience
  - Quarterly newsletter
  - More frequent "update" presentations
  - Break material into smaller news briefs for easier digestion

- Researchers value an individual they can go to with questions
  - One of our compliance groups changed from a central help-desk model to assigning team members to manage activities with specific academic departments
  - Faculty referrals can be significant

- Increase outreach efforts and presentations to faculty
  - A brief high-level overview can be effective and scalable
  - Q&A time allows you to assess where they have questions and level of understanding
  - OK to start small, focusing on high risk areas first, expanding over time

With this effort, better engagement with academic units remains a notable and reoccurring ask

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Key Takeaways

Research security in universities

- is aligned with the principles and values of the institution

- is owned by an office, but is championed by all

- involves training and consistent communication

- has clearly defined and easy to find policies

- follows the lead of laws and guidelines

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Avoimuutta?

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Niin avointa kuin mahdollista ja niin suljettua kuin tarpeen

Ongelmien ja ratkaisujen tulisi olla jaettuja

Discussion

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Where is your institution in the process of handling dual use export control, sanctions, critical technologies, research security?

Do you cooperate with your colleagues locally, nationally or internationally?

What do you need in order to perform your task optimally?

How do you match openness and cooperation with security and protection?

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