

COU Academic Colleagues Committee Report to the Ontario Tech U AC

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Synopsis

This report provides an overview of two meetings held on May 15 and 16, 2024. The May 15 evening meeting was a presentation by an invited speaker followed by a brief discussion while the main COU colleagues meeting occurred on the Wednesday morning. Both meetings were held in a hybrid format (in-person and online) and I attended these on-line.

Background

The objective of the COU Academic Colleagues committee is to support the COU Council, consisting of the executive heads of the institution members of the COU, with feedback from academic colleagues concerning COU initiatives.

Meeting Summaries

Evening meeting, May 15, 2024

Safeguarding Research: Update on new Federal Policy Sensitive Technologies and Research Affiliations of Concern. Charmaine Dean, Vice-President, Research & International and Justin Nankivell, Director, Research Security, Waterloo.

- The STRAC policy is now mandatory for all professors, marking a new normal in academic partnerships. There's a focus on balancing open science with regulations and ensuring faculty members aren't targeted.
- Modest changes to the policy may occur, and the list of affected entities could expand, but not exponentially. The research office is looking for ways to simplify processes and support collaborations.
- Academic freedom is fundamental, but the federal government won't support research involving entities not allied with their conception of foreign interference. This has become more critical since the Ukraine war.
- Collaborations can't be abruptly stopped as research and publications can take years. The provincial context is more stringent than the federal one.
- Collaborations with any government sanctioned by Canada are prohibited. The focus is on ensuring support for all, especially graduate students, regardless of their origin.
- In social sciences and health sciences, the challenge is usually dual-use technologies. If a piece of research could potentially enable nefarious activities by another country, it will need to be investigated.
- Justin leads a community of practice discussing these issues. The group is constantly communicating with federal and provincial governments to ensure they understand the research enterprise without exaggerating the situation. All universities in Ontario are represented in the community of practice. Researchers engaging in research with a military organization and receiving funding from them, but not applying to the government, could face difficulties.
- The provincial government has requested an inventory of all partnerships with named institutions. Collaborations with named organizations, such as Huawei, must be disclosed.

- There have been instances of CSIS approaching faculty members directly, but now conversations are routed through the research office for support.
- Discussions are ongoing about replacing lost funding, particularly as it significantly impacts graduate students. The federal government is being urged to support enhanced activity in the industry. An industry roundtable has been agreed upon to facilitate these discussions.
- See attached ppt slides for further details

Discussion:

- Questions were asked about concerns re: topics that may be on the list, community-based research, how well governments understand the research enterprise when they are making new rules.
- The focus is on things that can be used as weapons and not on critical perspectives. There is some fuzziness with regards to social science research and community-based research. Online workshops are available: <https://www.publicsafety.gc.ca/cnt/ntnl-scrct/cntr-trrrsm/cntr-prlfrtn/sfgrdng-scnc/sfgrdng-scnc-wrkshp-en.aspx>

Morning meeting, May 16, 2024

1. Information Sharing

The group shared some of the challenges that their universities have been discussing at their senate and/or academic councils. These issues varied among the institutions, but common items included: encampments, financials (e.g., severe cuts of 25% at RMC), searches for or hiring of new members of senior leadership, and housing.

2. COU President's Report (Steve Orsini)

- Bill 166, currently in its third reading, is intended to pass with only one approved amendment that expands reporting requirements related to hate speech. There are concerns about the lack of public consultation, the scope of the bill, and the ability to issue directives without consultation or transparency. Universities are already required to have a reporting process under OHRC. COU already has an open data site for transparency.
- There's a \$1.3 billion funding plan, with about a billion in new funding and \$300 million already planned. This includes \$700 million over three years for operating costs and \$200 million for those in distress. However, there are concerns about the cap on enrolment, the increase in high school students applying since 2020, and the potential crisis in three years due to one-time funding.
- The SMA4 renewal is underway, with the government aiming to avoid discussions about price and volume. There's a need to increase WGUs as costs rise but funding does not keep pace.
- There are concerns about encampments and non-student actors posing risks to students. Universities are trying to manage the situation and ensure safety.
- Universities are reducing the number of unfunded students, and entrance requirements are expected to increase. This could put more pressure on the government, especially when highly qualified students cannot gain admission. Brain drain can occur when students cannot get into the university of their choice and go out of province.

- The government is expected to require only the information they want to know, not the full picture. There's a need to disclose additional information that tells the universities' story, such as mental health wait times.
- On May 27, university presidents may be invited to speak to the government, but it's unclear who will be invited.
- There's an astronomical demand for mental health services and academic support for students. About 13% of operating budgets are spent on student supports, and new ways to accommodate these needs are being explored.
- The corridor was never designed to be frozen indefinitely, and its current state undermines economic growth. There's a need to protect institutions providing broad-based education in underserved regions.
- There's a lack of housing for international students in particular, and the majority of universities are above their corridor.
- Student wellness funding is not provided by the Ministry of Health at universities, leading to a system-wide disconnect and a lack of integration with local healthcare systems.
- There are financial guardrails in place, but part of Bill 166 and the government's affordability language are problematic. There's a concern about losing institutional autonomy, and a fierce fight is expected to maintain it. Universities are publicly assisted, not publicly funded.

3. Draft Meeting schedule for 2024-25

4. Other Business

For Information:

April 2024 Policy Update for Affiliates:

Ontario 2024 Budget

- On March 26 Ontario Finance Minister Peter Bethlenfalvy delivered the provincial government's 2024 Spring Budget, *Building Better Ontario*.
- The Budget focused on attracting investment to Ontario, making key investments in infrastructure and housing, and addressing cost-of-living issues to relieve pressure on Ontarians. It focused on themes of: rebuilding Ontario's economy; building infrastructure, highways and transit; working for workers; keeping costs down; and better services for you.
- Of note to the sector, postsecondary-related announcements were primarily grouped under Keeping Costs Down, highlighting the extension of the tuition freeze, and Better Services for You, highlighting last month's postsecondary funding announcement and the new York University medical school.
- Minister Bethlenfalvy foregrounded the extended cut and freeze on tuition as a measure to reduce pressure on Ontario's students and families, saying the government will not "raise taxes, tolls, tuitions or fees."

Future Financial Sustainability

- The Ontario government's underfunding, tuition cut and freeze, and inadequate response to the Blue-Ribbon Panel recommendations leaves the sector in a financial sustainability crisis. The need for sector leadership in reducing reliance on government and protecting

institutional autonomy has never been greater.

- While advocacy will continue on tuition relief and long-term sustainable funding/revenue levers, the sector will need to leverage its long tradition of transforming to drive greater efficiencies and cost-saving strategies.
- A joint OCAV-CSAO Steering Committee (comprising the chair, vice chair and past chair of those affiliates) was struck and tasked with developing a Future Financial Sustainability Strategy that brings forward “bold ideas” for transformation and practical solutions that may help support the sector in the absence of systemic funding solutions offered by government. Some activities for consideration by Executive Heads include but are not limited to: research/jurisdictional landscape on revenue/efficiency models that could be adapted for an Ontario context; curriculum and course streamlining; alternative revenue generation; and enhanced efficiency initiatives.
- Pending direction from Executive Heads, CSAO and OCAV respective affiliates (and working groups etc.) may be asked to undertake work and increased sector collaboration in actioning ideas over the short-, medium- and long term.

College Applied Master’s Degrees

- On February 26 the Ministry of Colleges and Universities proposed a regulation amending O. Reg. 279/02 (under the *Postsecondary Education Choice and Excellence Act, 2000*) to allow the Minister authority to grant consent to publicly assisted colleges meeting certain conditions to offer master's degrees.
- The Ministry’s objectives are to:
 - Introduce new, carefully developed programs at the graduate level in Ontario that will produce graduates in key sectors with the targeted skill sets that employers are looking for.
 - Offer students new choices when it comes to graduate programs in Ontario.
 - Recognize colleges’ expertise in offering programs which focus on applied study and applied research and are different from master’s degree programs in the university stream.
- The deadline for public comment is April 11. COU will be collecting data and developing a response to demonstrate the breadth of master’s degrees already offered by the university sector, and the importance of a differentiated postsecondary sector.

International

- On March 27 the Ministry announced its plan for allocating the IRCC study permit applications across Ontario institutions. Ontario will allocate 96% of permit applications to publicly assisted colleges and universities, with the remaining 4% going to Ontario’s language schools, private universities and other institutions. Career colleges will not receive any applications.
- Applications will be allocated to institutions based on the following criteria:
 - Prioritize programs in the following high-demand areas: skilled trades, human health resources, STEM, hospitality, and child care.
 - Cannot exceed the institution’s 2023 permit levels.

- As a final backstop, the ratio of international permits cannot exceed 55% (exclusive of high-demand areas) of the institution's 2023 first-year domestic enrolment.
- French-language enrolment will also be prioritized as employers compete for workers with French-language skills.
- Most international students seeking to study in Ontario must provide a provincial attestation letter (PAL) with their study permit application. The letter serves as proof that the applicant has been accounted for within the maximum allocations set by the federal government. To acquire a PAL, students should contact their admissions office at the institution where they have accepted the offer of admission and intend to enroll.
- The government is also:
 - Requiring all publicly assisted colleges and universities to have a guarantee that housing options are available for incoming international students.
 - Investing over \$32M to support the mental health of postsecondary students.
 - Introducing the *Strengthening Accountability and Student Supports Act, 2024* that would, if passed, help to enhance the student experience by putting in place additional measures to support mental health, safe and inclusive campuses and allow for increased transparency of fees.
- The federal government has adjusted the date from which international graduates from public-private college partnership programs would not be eligible for a post-graduate work permit (PGWP) from September 1, 2024 to May 15, 2024.

Bill 166, *Strengthening Accountability and Students Support Act, 2024*

- Bill 166 was tabled by the Ontario Minister of Colleges and Universities on February 26, 2024. If passed, Bill 166 will require every college of applied arts and technology and publicly assisted

university to have a student mental health policy and a policy that describes how the institution will address and combat racism and hate. Bill 166 will also authorize the Minister to issue directives regarding the information to be provided about the costs associated with attendance at a college or university.

- COU submitted a letter to Minister Dunlop on March 27 in response to the Bill.
- Universities spend nearly \$1.6B annually on student services, a spending increase of nearly 27% over the past 5 years.
- While universities support the overall intent of the proposed legislation, the lack of provincial funding for these activities, coupled with the fact that these activities will be administered through Ministerial directives, ultimately undermines the objectives of Bill 166 and the institutional autonomy of universities. Furthermore, many of the policies, frameworks and cost transparency that Bill 166 seeks to develop are already in place at universities. A new directive will only duplicate existing efforts, while increasing red tape.
- COU recommendations:
 - Provide long-term, sustainable funding to universities to ensure they can continue to provide critical resources and supports to students.
 - Set the directives within the proposed legislation through the Lieutenant Governor in Council (LGIC), rather than through Ministerial directives, recognizing the institutional autonomy of universities.
 - Provide increased, multi-year direct base funding for postsecondary student mental health.
 - Allow flexibility in how institutions can use student mental health funds to ensure they respond most effectively to the unique needs of their students.
 - Collaborate with the sector in the development and implementation of any new mental health strategy to ensure optimal outcomes for students, universities and communities.
 - Help fund the current initiatives and student services in place to address hate speech, harassment and discrimination.
 - Avoid duplicative legal and statutory requirements being issued by Ministerial directives that undermine institutional autonomy.

Research Security

- The federal government has released a new policy on Sensitive Technology Research and Affiliations of Concern (STRAC), which includes publishing a list of sensitive research areas and a list of named research organizations (NROs) of concern.
- Ontario is now moving forward with the implementation of the next phase of safeguarding Ontario research, which includes:
 - Application stage attestations: All Ontario Research Fund (ORF) programs will be implementing an attestation form as part of their application package. The research team will be asked to attest that they do not have any active collaborations with any researchers and entities on the federal NRO list.
 - Streamlined disclosure process: The scope of disclosure requirements has been streamlined to no longer include low-risk agreements and focus only on agreements with NROs, governments on Canada's sanction list, and commercial or public entities that are banned under existing federal legislation or administrative sanction.

- TPAs will be updated to refer to the STRAC policy and its related list, along with the federal sanction list.

5. Discussion on Future Topics / Planning for April 6 Council meeting

The meeting ended with a discussion on the topic that will be the focus for the March meeting that will also be the topic for discussion at the April council meeting with the executives.

STRAC Policy Overview

- STRAC became effective **May 1, 2024**
 - ❖ Applies to **all** grant applications submitted to federal funding agencies (NSERC, CIHR, SSHRC) and CFI for research that will advance one or more Sensitive Technology Research Areas.
- The STRAC policy is based on two lists which operate in conjunction:
 - ❖ Named Research Organizations (NRO) – list of 103 foreign research organizations and institutions from countries of concern
 - ❖ Sensitive Technology Research Areas (STRA) – list of 11 high-level sensitive technology research areas, each with sub-categories indicating the sensitive technology research area.
- This policy applies to **current and ongoing** affiliations with listed institutions.
- Researchers with past affiliations to an NRO who are no longer affiliated, fall outside the scope of the policy.

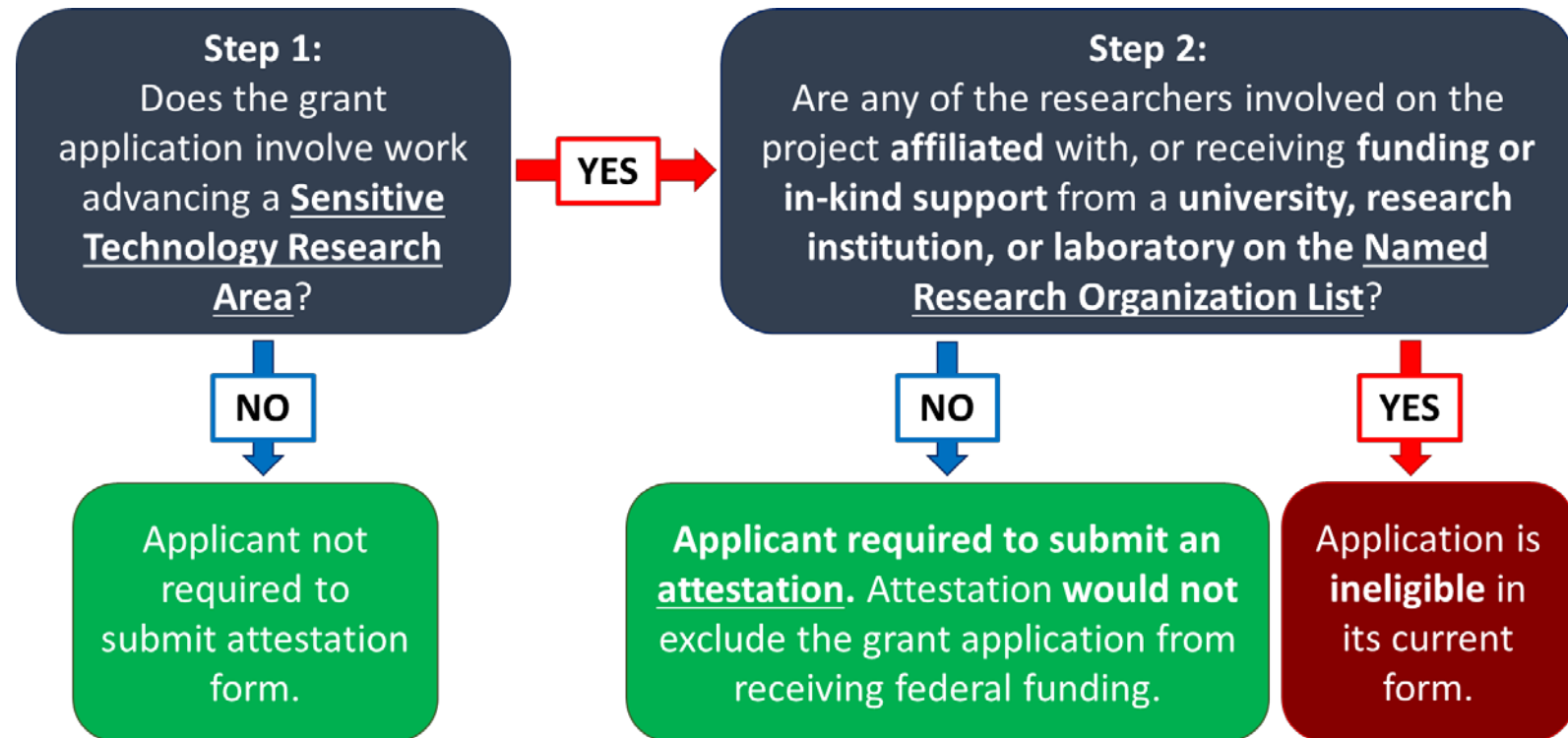
Important to note: A research will not be funded under STRAC if the research advances a STRA and the researchers are affiliated with a listed NRO.



Responsibilities of Researchers

Grant applicants must undertake a **two-step process** to determine what requirements apply:

- **Step 1:** Will your research advance any Sensitive Technology Research Areas?
- **Step 2:** Verify researchers' affiliations and complete attestation requirements



MEMORANDUM

To: Academic Colleagues

CC:

From: Charmaine B. Dean, Vice President, Research and International

Date: May 13, 2024

Subject: Safeguarding Research: Update on new Federal Policy on Sensitive Technologies and Research Affiliations of Concern (STRAC)

Overview

In January 2024, the [Government of Canada announced](#) the [Policy on Sensitive Technology Research and Affiliations of Concern](#) (STRAC Policy). This policy is designed to protect Canada's research ecosystem from foreign influence by research institutions connected to military, national defence, or state security entities who pose a risk to Canada's national security. This policy is effective **May 1, 2024**, and applies to **all** grant applications submitted to federal funding agencies (NSERC, CIHR, SSHRC) and to the Canadian Foundation for Innovation (CFI) for research that will advance one or more sensitive technology research areas.

The policy is based on two lists which operate in conjunction:

[Named Research Organizations](#) (NRO) – list of 103 foreign research organizations and institutions that pose the highest risk to Canada's national security due to their direct, or indirect connections with military, national defence, and state security entities.

[Sensitive Technology Research Areas](#) (STRA) – list of 11 high-level sensitive technology research areas, each with sub-categories indicating the sensitive technology research area.

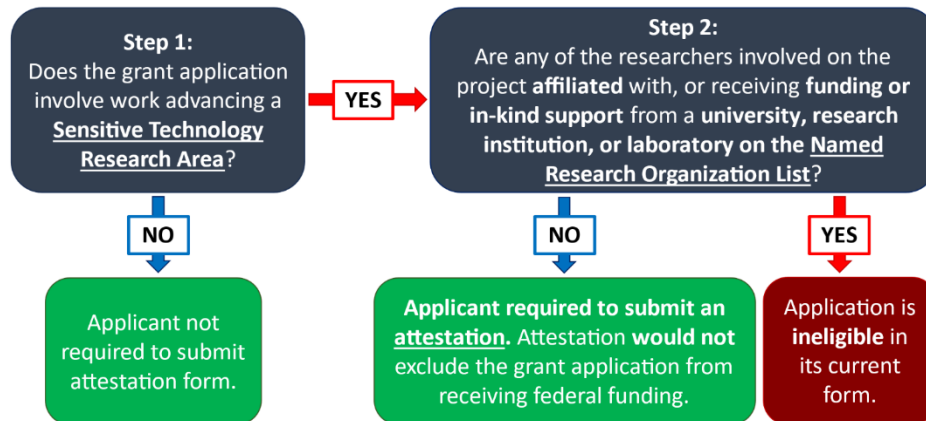
Grant applications involving research that aims to advance a sub-category as listed in the STRA list will not be funded if any of the researchers involved in activities supported by the grant are currently [affiliated](#) with, or in receipt of funding or in-kind support, from an NRO.

This policy applies to **current and ongoing** affiliations with listed institutions. Past affiliations, such as a researcher who previously obtained an undergraduate degree from an NRO but is no longer affiliated with it, fall outside the scope of the policy.

Responsibilities of Researchers

Researcher must familiarize themselves with the [STRAC](#) policy prior to applying for a Tri-Agency or CFI research grant.

Grant applicants must undertake a **two-step process** to determine what requirements apply:



Step 1: Will your research advance any Sensitive Technology Research Areas?

Determine if the proposed research **advances** at least one of the sub-categories listed in the [STRA](#). To “advance” research means that the research supported during the course of the grant will aim to support the **generation or discovery of knowledge that contributes to progress in the development of a technology** described in the sub-categories of the list of STRAs. To clarify, the “list is **not intended** to cover the **use** of any technology that may already be ubiquitous in the course of a research project” (emphasis is ours).

IF the research grant **WILL NOT** advance any sub-category listed in the STRA, then no further action is required under this policy.

Step 2: Verify researchers’ affiliations and complete attestation requirements

For grant applications that **WILL** advance a [STRA](#), applicants then need to determine if any of the researchers with [named roles](#) in the grant application are [affiliated](#) with, or receiving funding or in-kind support from, an [NRO](#).

If no affiliations exist, **ALL** researchers with **named roles on the grant application** must fill out and submit an [Attestation Form](#) certifying their compliance with the STRAC policy. Attestations cannot be provided on behalf of others. The primary applicant is responsible for collecting and submitting all individual attestation forms.

For the duration of the grant, all researchers, including all HQP and collaborators involved in research activities supported by the grant, **must** comply with the policy. A failure to comply with this policy could result in recourse under the [Tri-Agency Framework on the Responsible Conduct of Research](#).

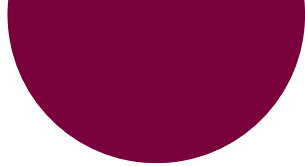
Provincial Match

The Ontario Government has also articulated in conjunction with STRAC Policy two further areas of concern for researchers to be aware of:

- All governments named on the [Government of Canada's sanction list](#); and
- Commercial or public entities that are banned under existing Government of Canada legislation or administrative sanction (e.g., [entities banned from Canada's 5G network](#)).

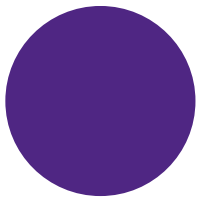
Ontario Council on University Research (OCUR) Safeguarding Research Working Group

The OCUR has established a working group to ensure the security of the Canadian research enterprise, including the development of guidelines for securing Canadian research advice on protecting research data and outcomes and sharing best practices. The follow [document](#) guides these discussions. The email contact for this group is: contact@ontariosuniversities.ca.



A Shared Commitment by Universities to Protect Ontario's Research

September 2023



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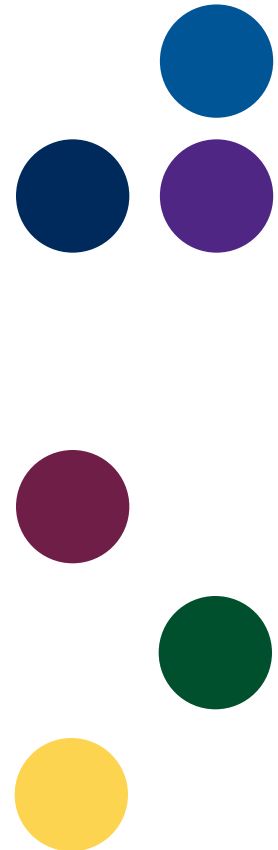
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INTRODUCTION

Global engagement is indispensable to the success of our universities, their competitiveness on the world stage, and their ability to enhance the quality of life of Ontarians and Canadians through learning, discovery, and community service. While openness, collaboration, equity, diversity and inclusion are critical to discovery and innovation, Ontario's universities recognize that vigilance is critical to preventing loss of opportunities, as well as to ensuring research conducted on campuses is not misused and continues to be converted into tangible benefits and economic prosperity for Ontario and Canada.

With a shared goal to safeguard Ontario and Canada's research ecosystem through openness and responsible conduct of research, Ontario's universities are partnering with all levels of government – as well as allies through the G7 research security and integrity working group – to ensure research is secure. Universities have robust policies and practices on research conduct, keeping with the highest standards of honesty, fairness, trust, accountability and openness. These policies and practices operate within the context of federal guidelines such as the Tri-Agency Framework: Responsible Conduct of Research (2021) and the Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans – TCPS 2 (2022) as well as other guidelines including those on animal care.

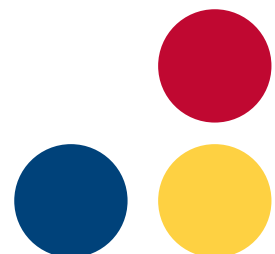
In today's rapidly shifting geo-political environment, safeguarding research will continue to be a priority for universities across the province, as university research offices continue to take reasonable and risk-based measures to safeguard investments in research.

In fact, Ontario universities have been leaders, in collaboration with the Province of Ontario and Government of Canada, in establishing a national security framework for university research and have supported discussions with the [Government-Universities Working Group on Research Security](#).

Universities will continue to follow guidelines set by government agencies and funders, protecting research for the benefit of Ontario and Canada. Universities work to identify and manage the risks associated with areas of research these agencies consider to be of national strategic importance.

Enhancing the security and integrity of universities' research enterprise will help protect research data and intellectual property and promote safe partnerships.

The document should be viewed as an evergreen document that will be regularly reviewed and updated, as developments and activities related to safeguarding research evolve.



SAFEGUARDING RESEARCH VALUES FOR ONTARIO UNIVERSITIES

These values underpin our collective approach to safeguarding research leading practices at Ontario institutions.

1. **Integrity:** as a core principle for researchers and institutions.
2. **Respect:** for academic freedom, open-science and diverse and inclusive campus environments.
3. **Trust:** across funders, partners, governments, and universities.
4. **Resilience:** in developing policies and practices to safeguard research and advance research activity.
5. **Compliance:** with all relevant laws, regulations, and ethical standards related to research security.



SAFEGUARDING RESEARCH PRINCIPLES FOR ONTARIO UNIVERSITIES

Institutions should collaborate on developing best practices through research offices and on accessing shared technologies to help identify, assess and mitigate threats to innovation and research security.

1. **Transparency:** Transparent within the institution, with our federal and provincial/territorial governments, and with our broader communities.
2. **Predictability:** Provide predictability for researchers, research administrators, as well as our governments and the larger society.
3. **Engagement and inclusivity:** Engagement across the university, with particular attention towards upholding principles of diversity, equity, and inclusivity.
4. **Protection of researchers, their research and research spaces:** Support researchers in protecting their research from foreign interference, espionage, intellectual property theft or unauthorized knowledge transfer.
5. **Consistency:** Consistency in risk assessment of research projects on national security grounds.
6. **Breadth and depth of perspectives:** Ensure there is broad disciplinary expertise and intricate knowledge of national security risks leveraged for accurate risk assessment and mitigation.
7. **Shared Responsibility:** Safeguarding research is everybody's responsibility, from the federal government to administrative offices to faculty members.



LEADING PRACTICES TO SAFEGUARDING RESEARCH AT ONTARIO'S UNIVERSITIES

1. Governance and Risk Frameworks

Governance and risk assessment frameworks guide the integration of risk mitigation strategies into existing policies and procedures. They also identify where best practices can be incorporated into each universities' strategies to safeguard research.

Institutional Research Safeguarding within the Responsible Conduct of Research

Practice

Develop an institutional governance and risk framework for safeguarding research that aligns with Ontario and complements federal government guidelines. In doing so, institutions should seek to provide to researchers clarity and consistency on the expectations among any government requirements, the National Security Guidelines risk assessment process and other guidelines and/or criteria that are developed by governmental or institutional authorities.

Outcomes

- University researchers are supported in understanding services to safeguard research and in following granting agency and other sponsor's procedures.
- Greater transparency, predictability, and equity in the safeguarding research process.
- Strengthened institutional policies and practices on research security.

Actions

- When developing the governance and risk framework, universities consult and engage relevant academic and administrative stakeholders and accountable authorities in the university. Promising approaches include:
 - Build an interconnected team to support safeguarding research that would include representation from key researchers, faculties, departments, centres and institutes and administrative support units, such as campus security, information technology services, global engagement, graduate and postdoctoral studies, commercialization, entrepreneurship, innovation and partnership offices and procurement, to inform the development of institutional practices that are governed by institutional principles, policies and practices.
 - Developing institutional risk assessment and mitigation approaches for possible adaptation in specific research activities. These could range from actions such as declarations of conflicts of interest to other appropriate means of assessing and forming appropriate partnerships/collaborations, etc.
- Ensure the university benefits from membership in relevant associations such as Council of Ontario Universities, U15 and Universities Canada to ensure effective communication with provincial and federal governments.
- Ensure the university establishes open and frequent communication with provincial and federal governments (i.e., Innovation, Science and Economic Development Canada (ISED), Public Safety Canada, Tri-Agencies and provincial associations), funding agencies (i.e., MITACS and Genome Canada) and consortia across the sector (i.e., Council of Ontario Universities, Universities Canada and U15).

Government Engagement Strategy

Practice

Engage with the Government of Ontario and the federal government to consult on and implement the National Security Guidelines for Research Partnerships and other governmental safeguarding research guidelines, regulations, principles and policies.

Outcomes

- Greater harmonization between government and universities in Ontario on risk mitigation issues, best practices, and information sharing.
- Greater consistency, efficiency and understanding of research partnership and mitigating decisions across various institutions.
- More comprehensive understanding regarding the role and application of dual-use or sensitive technologies and export control regulations.

Actions

- Work with the provincial government, the Government of Canada's Research Security Center and other agencies within Public Safety Canada to ensure common understanding of principles and objectives and emerging national security threats and trends.
- Engage with the Ministry of Colleges and Universities and the Ministry of the Solicitor General and other appropriate authorities in Ontario to establish a common understanding of the procedures outlined in the [National Security Guidelines for Research Partnerships](#) and other relevant federal or provincial requirements.
- Collaboratively develop and utilize open-source methods and resources for completing risk assessments and risk mitigation plans under the [National Security Guidelines for Research Partnerships](#) and other relevant federal or provincial requirements; collaborate on the sharing of cost-effective tools to assess risk.



Existing Institutional Risk Frameworks/Policies/Guidelines

Practice

Review existing institutional guidelines or policies to consider where explicit consideration of safeguarding research is acceptable and warranted.

Outcomes

- An understanding of how safeguarding research policies and practices fit within the overall conduct of responsible research.

Actions

- Identify any gaps or issues relating to safeguarding research in the context of established policies and practices for the responsible conduct of research and address them to ensure an overall coherent and consistent institutional approach to research management.
- Develop risk frameworks for managing risks to research, including foreign interference threats to people, information, systems, and assets.
- Ensure institutional guidelines, practices, or policies outline responsibilities, obligations, expected conduct, and consequences.



Ground Research Security in the Principles of Equity, Diversity and Inclusion and Mitigate the Effects of Racial and Ethnic Profiling on the Academic Community

Practice

As part of their initiatives to combat racism and ethnic profiling, institutions have an important role to play in ensuring that efforts to support research security include specific anti-racism and anti-ethnic profiling action and the support of racialized and researchers.

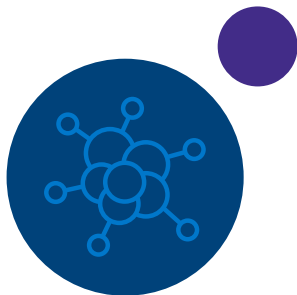
Advocate for and support inclusive research environments, policies and practices, so that researchers are enabled to pursue appropriate international scientific inquiry without fear of prejudice, profiling, or persecution.

Outcomes

- Universities offer an enriching and safe climate for all researchers.
- International and domestic students feel welcomed in their pursuit of their studies in Canada and do not have to fear reprisal at home or abroad.
- Universities safeguard research while upholding principles of equity, diversity and anti-racism.

Actions

- Identify mechanisms to maintain the spirit of international collaboration, while safeguarding foreign and domestic researchers.
- Be vigilant that research security training and messaging work within an anti-racist and inclusive framework while emphasizing the importance of a secure international and collaborative scientific community.



2. Due Diligence, Risk Assessment and Management

The activities related to due diligence, risk assessment, and risk management guide the university in identifying, assessing, and mitigating risk and ensure university stakeholders understand their role in informed decision making and help guide practices.



Due Diligence, Risk Assessment and Management Related to Corporate Partners

Practice

Provide assistance to researchers in their risk assessments of partners, provide clarification of at-risk activities (i.e., dual-use, sensitive, or strategic technologies), and assist in preparing and actioning risk mitigation plans.

Outcomes

- Researchers are well supported in the development of risk assessments and mitigation.
- Awareness of research security issues related to the commercialization processes and protecting researchers' intellectual property.
- International research partners are reassured of a safeguarded research environment.
- Professional reputations of the researcher and the institution are upheld.

Actions

- Conduct discussions with researchers to collaboratively develop risk assessments and mitigation strategies. Where desirable and feasible, provide engagement formats of various kinds, including one-on-one, to facilitate better learning outcomes and more robust risk mitigation strategies. Discussions with affected researchers could also facilitate sharing of best practices of risk assessment, particularly across research teams.
- Provide a clear reporting framework for possible foreign interference incidents.
- Continually monitor unintended consequences of risk assessments faced by researchers, such as a reluctance to pursue funding opportunities, with special attention to issues related to diversity, equity, inclusion and self-censorship.
- Develop risk mitigation strategies to support safeguarding the results, methodologies, and data as products of research at the institution within an open science context.
- Develop approval, audit, and continuous evaluation of due diligence processes.
- Enact continuous learning and improvement in the processes of risk assessments.



Mapping Key Partnership Networks and Supporting Alternative Funding Sources

Practice

When appropriate, research offices should work with researchers to diversify funding sources, including through government support, especially for those working in sensitive research areas that are affected by the national security guidelines.

Outcomes

- Researchers have a diversity of funding partners that support their research ambitions.
- Leading-edge research and innovation are sustainably funded over the long term.
- Institutions continue to draw top talent through funding opportunities.

Actions

- Assess and evaluate alternative funding sources.
- Conduct a mapping exercise of key partner networks to understand institutional and contractual linkages and identify alternative funding sources.
- Advocate for expanded government funding sources for sensitive research.

Assessing University-Specific Priority Areas

Understanding vulnerabilities will allow prioritization of areas which may require further protections, particularly with respect to cybersecurity and the strengthening of data management protocols.

Practice

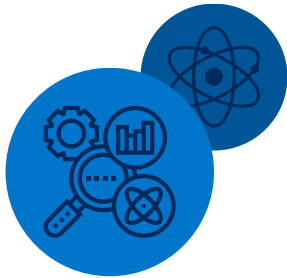
Ensure your institution is aware of the sensitive areas of science and technology identified by government that are potentially vulnerable to foreign exploitation.

Outcomes

- Institutional infrastructure and resources are better protected.
- Researchers are more aware of current threats and how to protect their resources.

Actions

- Conduct an analysis of sensitive research activities to identify priority areas and potential vulnerabilities and partners that render them sensitive areas.
- Consult with researchers and managers of research facilities to check for vulnerabilities and to identify and eliminate security gaps to build institutional resilience.
- Engage with information technology services and researchers to construct mitigation strategies for critical areas.
- Engage with researchers and managers working in sensitive research areas or higher risk partnerships about potential threats and the implementation of risk mitigation plans.



Institutional International Partnerships

Practice

Work with international offices, where relevant, to align formal institutional international partnerships in sensitive research areas with safeguarding research principles, taking into account the Government of Canada's list of prohibited entities that pose a risk to national security.



Outcomes

- Researchers are more aware of potential international partnership risks.
- University staff are better equipped to understand and undertake risk assessments and develop risk mitigation strategies related to sensitive research involved with international partnerships.

Actions

- International engagements in areas of sensitive research should be consistent with the Government of Canada's list of prohibited entities that pose a risk to national security in sensitive areas of technology, rendering them vulnerable to research threats.
- Develop risk assessment and mitigation strategies for international institutional partnerships in areas of sensitive research.
- Develop processes for conducting internal risk assessments of international institutional Memorandum of Understandings and for screening various new international partnerships in sensitive research areas.
- Provide useful and relevant information to researchers and units that guides international engagements in sensitive research areas.
- Develop criteria and training for the consideration of current and potential international partnerships in sensitive research areas.
- Engage with Ontario institutions to share best practices, perspectives, and processes on international partnerships and support consistency in approaches across the sector.
- Continue to strengthen internal links among institutional units which engage in international partnerships, including offices that deal with research and international activities.

Procurement – Risk / Benefit Analysis in support of U.S. collaborations

The United States' John S. McCain National Defense Authorization Act Section 889(a)(b), public law 115-232, impact current and future U.S. federally funded research grants and contracts.

Section 889(a)(1)(B) prohibits executive agencies from entering into, or extending or renewing, a contract with an entity that uses any equipment, system, or service that uses covered telecommunications equipment or services as a substantial or essential component of any system, or as critical technology as part of any system, on or after August 13, 2020, unless an exception applies, or a waiver is granted.

If an institution has any equipment that is banned, it will prohibit researchers from applying for U.S. federal contracts.

Practice

Institutions to conduct a risk/benefit analysis of potential responses by the institution to the McCain Act to best support researchers.

Outcomes

- A well-developed institutional strategy to address the provisions of the McCain Act

Actions

- Inform and support applicants and grant holders about restrictions.
- Develop processes with procurement, research finance, and research legal counsel to ensure continued compliance with the McCain Act and appropriate language in service contracts.
- Conduct a risk/benefit analysis of potential institutional responses to the McCain Act and develop a response with a researcher focused solution.
- Engage with U.S. partners through relevant consortia such as Council of Ontario Universities, U15 and Universities Canada to monitor and better understand emerging requirements.



3. Communication, Education and Knowledge Sharing

Safeguarding research is a sensitive topic. Universities should be proactive and thoughtful about their communications at all levels within their organizations to ensure a culture of resilience and avoid undue negative impacts on any of their members.

3.1. Website as a Resource Hub for Institutional Activities and Supports

Practice

Build a single publicly accessible portal for the institution, such as a website, that brings together supports and services to the broader community on how to understand safeguarding research issues, safeguarding research principles and up-to-date guidelines.

Outcomes

- University community members better understand safeguarding research.
- University community members are updated regularly as guidelines change.
- University community members are provided with consistent and transparent information.

Actions

- Develop and include training materials that focus on safeguarding research and cybersecurity/digital-hygiene best practices.
- Regularly update the portal with relevant information, such as risk mitigation forms, event dates for workshops, information sessions, and training.
- Seek feedback from the community to continually improve the portal.



Learnings from other provincial organizations

Practice

Engagement with provincial partners on best safeguarding research practices, leading to greater harmonization of best practices and approaches across Ontario.

Outcomes

- Greater harmonization, knowledge and faster implementation of best practices across Ontario institutions.
- Greater knowledge and faster implementation of best practices.
- Increased collaboration on strategies to anticipate and mitigate risks related to the safeguarding of research.
- Amplification of the key messaging of the institution to achieve greater impact on best practices across the institution.

Actions

- Engage with other provincial institutions to bring together staff leading safeguarding research work, such as research security officers, to share protocols and practices.
- Develop formal and informal networking groups within the province such as expert briefing series, working groups and communities-of-practices amongst research security officers to enable understanding of approaches and harmonization.
- Continually refine safeguarding research principles based on useful common practices.

Learnings from other jurisdictions

Practice

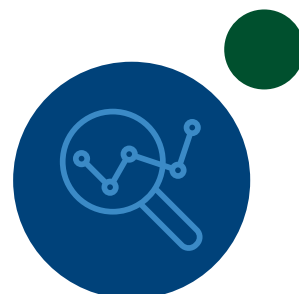
Engage with international partners on best safeguarding research practices, leading to greater harmonization of international best practices.

Outcomes

- Greater harmonization of practices across key international partners.
- The creation of a global network of trust and best practice sharing.

Actions

- Through relevant consortia, such as Council of Ontario Universities, engage with university counterparts in peer-countries and peer-institutions to understand their protocols and current practices.
- Continually refine safeguarding research principles based on useful common practices.



Host regular major events to hear community-wide views

Practice

Invite key stakeholders (i.e., Ontario and federal officials, funding agencies, researchers, research security experts) to discuss issues relating to safeguarding research and help raise our level of common and mutual understanding.

Outcomes

- An enhanced shared and mutual understanding of the key issues as the landscape evolves.

Actions

- Engage with researchers, research security experts, cybersecurity experts, peer-institutions, and government to convene meetings and workshops.
- Convene regular opportunities for networking.



4. Network and Device Security

A university's vulnerability to cyber-attacks is influenced by their range of activities, size, and complexity. With the shift toward digital in research, education, and communication there is an increased need for attention to cybersecurity.

Practice

Continually monitor institution networks and devices to ensure they are secure and reduce the probability of cyberattacks, hacking, and network manipulation.

Outcomes

- Reduced probability of cyberattacks, hacking, and network manipulation.

Actions

- Develop guidance for the secure use of portable storage devices.
- Make cybersecurity training available for all researchers and promote uptake.
- Support greater security of research computing and storage assets on appropriate infrastructure.
- Consider implementing a travel device loan program, particularly for travel to higher-risk countries.



5. Research Security and Campus Security Services

Understanding vulnerabilities of research spaces and laboratories is important, allowing researchers and other staff to understand which areas may require further protections, particularly with respect to cybersecurity and the strengthening of data management and protocols. This includes an understanding of on-campus physical and digital security resources.

Practice

Utilize a whole institution approach by mobilizing campus partners to understand vulnerabilities and assess and mitigate risks to research spaces.

Outcomes

- Greater understanding and cooperation may lead to harmonization between research offices, campus security teams, and university management on risk mitigation strategies.
- More comprehensive understanding regarding the role of campus security and IT teams in the delivery of research security mandate within universities.
- Enhanced protection of research facilities, research spaces and laboratories.



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Actions

- Conduct an analysis of research premises to identify priority areas and potential vulnerabilities within research spaces and IT systems.
- Consult with researchers to understand current security gaps within laboratories, research spaces and areas of vulnerability and eliminate risks to build institutional resilience.
- Engage with research leaders, safety offices, plant operations, information technology and campus security services to:
 - Establish efficient access control measures to research facilities, research spaces and laboratories in areas related to sensitive research.
 - Assess the requirement for potential additional security measures in sensitive labs and research spaces.
 - Construct mitigation strategies for the protection of sensitive research areas.

