

UNIVERSITY DEFENCE TRADE CONTROLS ACT COMPLIANCE RISK MATRIX

This matrix is intended to be used as a tool by University of South Australia (**UniSA**) staff to review and assess compliance risks under Australia's Defence Trade Controls Act (**DTCA**) legislation. Individuals should use this matrix to assess risks associated with a particular project, research or body of work.

This matrix is designed to assist individuals in gaining a general understanding of their exposure to Defence Trade Control risks and to support informed decision-making around risk management. It is not intended to be comprehensive or exhaustive. The matrix should be used in conjunction with official guidance from the Australian Government's Defence Export Controls (**DEC**) office and the DTCA legislation. Where potential Defence Trade Control risks are identified, individuals are strongly encouraged to first seek guidance from the University at exportcontrols@unisa.edu.au. The University will assist by providing tailored advice and support in navigating compliance obligations; and may seek help from DEC's Self-help Tool on its [My Australian Defence Exports \(MADE\) portal](#), legal advice or DEC directly.

DTCA Exposure	Low Risk	Medium Risk	High Risk
Area of research	<ul style="list-style-type: none"> Research does not involve goods, technology or software listed on the Defence and Strategic Goods List (DSGL); and Research has no other military or dual-use¹ applications. 	<ul style="list-style-type: none"> Research subject falls under Defence and Strategic Goods List (DSGL)-listed areas (e.g. aerospace and propulsion), but does not match exact specifications of controlled goods or technology. 	<ul style="list-style-type: none"> Research involves DSGL-listed goods, technology or software; or Research has other military or dual-use applications.
Type of research	<ul style="list-style-type: none"> Research meets criteria for the 'fundamental research' exemption; or Research is best described as "basic or applied research" and does not involve the development of new products, processes, or prototypes (as defined by the OECD); and Research is intended for broad dissemination in the public domain (e.g. academic publication). 	<ul style="list-style-type: none"> Research involves the development of products, processes, or prototypes defined by the OECD; and There is uncertainty about whether the research qualifies for the 'fundamental research' exemption. The research may have potential commercial applications, but is not yet tied to a commercial agreement or patent strategy. 	<ul style="list-style-type: none"> Research involves the development of a product, process, or prototype; and Research does not meet criteria for the 'fundamental research' exemption. Research is conducted as part of a commercial partnership, or is intended to result in a patent application. The research may involve restricted or dual-use technologies.
Publication restrictions ²	<ul style="list-style-type: none"> The results of the research are not subject to any restrictions (however imposed) related to the 	<ul style="list-style-type: none"> Publication restrictions exist on research, unrelated to security or defence (e.g. commercial-in- 	<ul style="list-style-type: none"> The research or research results are restricted due to security, strategic or defence purposes.

¹ Dual-use goods, software, and technology are items that are generally used for commercial purposes but have potential military applications. These are listed in Part 2 of the [Defence and Strategic Goods List \(DSGL\)](#).

² Publication restrictions refer to any limitations or conditions placed on the ability to publicly share, disseminate, or publish the results of research.



DTCA Exposure	Low Risk	Medium Risk	High Risk
	<p>security or defence of Australia or any foreign country.</p> <ul style="list-style-type: none"> There are no classified materials, contractual publication restrictions, legal export controls, or non-disclosure agreements (NDAs) affecting dissemination. Research is intended for open publication and public dissemination. 	<p>confidence, NDAs, privacy protections or intellectual property (IP) concerns; or</p> <ul style="list-style-type: none"> The research may use or build upon data from other projects that are subject to publication restrictions, but does not itself produce restricted data or results. 	<ul style="list-style-type: none"> Dissemination is limited or prohibited, and publication requires formal review or approval.
Nationality of researchers/project team	<ul style="list-style-type: none"> Processes are in place to determine citizenship and/or permanent residency status of all project members (researchers, Higher Degree by Research (HDR) students, assistants, etc.); and All project members have Australian citizenship or permanent residency. Access to DSSL goods and technologies is managed. 	<ul style="list-style-type: none"> Processes are in place to determine citizenship and/or PR status of all project members; and All foreign project members are from Five Eyes countries or countries listed in the Defence Trade Controls (Foreign Country) Instrument 2024 (Foreign Country List); and Access to DSSL goods and technologies is managed. 	<ul style="list-style-type: none"> Citizenship/permanent residency status of all project members is not confirmed; or Foreign project members are citizens of non-Five Eyes or Foreign Country List countries; or Access to DSSL goods and technologies is not managed.
Development and/or use of DSSL goods	<ul style="list-style-type: none"> Research does not involve the development or use of any tangible goods subject to export controls (this includes goods used as research equipment or as prototypes). 	<ul style="list-style-type: none"> Research involves development or use of tangible goods subject to export controls; and Goods involved in research are subject to security controls (e.g. stored separately in secure areas); and Goods are not taken outside Australia (e.g. via shipping; for conferences), or accessible to foreign persons within Australia (e.g. a prototype displayed at trade fairs) or via project team (based on answers to "nationality of researchers/project team above). 	<ul style="list-style-type: none"> Research involves development or use of tangible goods subject to export controls. <p>AND</p> <ul style="list-style-type: none"> Goods are not subject to security controls (e.g. they can be loaned to other researchers; stored in areas accessible by non-project personnel); or Goods are likely to/are required to be taken overseas, or accessible to foreign persons within Australia.
Provision of DSSL services	<ul style="list-style-type: none"> Research does not involve the provision of DSSL services 	<ul style="list-style-type: none"> Research involves provision of DSSL services to an Australian entity or individual; or Research involves provision of DSSL services to an entity or individual of unknown or unconfirmed citizenship/domicile. 	<ul style="list-style-type: none"> Research involves provision of DSSL services to a foreign entity or individual.
Physical security	<ul style="list-style-type: none"> Access to project workspace and physical materials is restricted to project members (e.g. via laboratory access restrictions); and 	<ul style="list-style-type: none"> Access to project workspace and materials is restricted in accordance with a security policy or procedure. 	<ul style="list-style-type: none"> Access to project workspace and physical materials is not controlled.



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	<ul style="list-style-type: none"> External individuals are screened for citizenship prior to being allowed access; and Foreign visitors seeking access are vetted for security concerns. 	<p>AND</p> <ul style="list-style-type: none"> Media/PR/filming requests accepted without review of associated DTCA risks (e.g. inadvertent 'publication' or 'supply' of DSGL technology); or International delegations are allowed access to project workspace without vetting/restriction; or Exchange students or students without Australian citizenship/Permanent residency are allowed access. 	
Cyber and information security	<p>Research activities are conducted in a highly secure and compliant environment:</p> <ul style="list-style-type: none"> The IT environment is fully managed and maintained by UniSA IT services. The IT infrastructure is intentionally designed to comply with Defence Industry Security Program (DISP) requirements and other relevant security standards. Research data is stored securely within domestic servers or approved platforms. No international access to research data is permitted, including by collaborators or during travel. 	<p>Research activities show partial compliance and moderate exposure to cyber risks:</p> <ul style="list-style-type: none"> The IT environment is managed, with some use of unapproved software or devices not fully secured. Research data is stored under an information security policy that considers DISP compliance, but implementation may be inconsistent. Some data may be stored or shared using unapproved platforms (e.g., personal devices, non-institutional cloud services). There is limited or informal international access, such as occasional sharing with collaborators or during travel. 	<p>Research activities are conducted in environments with significant vulnerabilities and non-compliance:</p> <ul style="list-style-type: none"> The IT environment is largely or fully unmanaged, with little oversight or security controls. Research data storage is ad hoc or fragmented, using various programs or platforms without centralized management. International access to research data is not managed, including: <ul style="list-style-type: none"> Sharing data via unsecured folders. Access during international travel. Use of international cloud providers for data storage. There is no effective enforcement of DISP compliance or institutional security policies.

DTCA Exposure	Low Risk	Medium Risk	High Risk
International travel	<ul style="list-style-type: none"> Researchers conduct no international travel for or during this research. 	<ul style="list-style-type: none"> Researchers conduct limited international travel for or during this research; and Travel is to Foreign Country List locations; and Notification is submitted to university/project staff prior to travel; and Researchers travel with dedicated, security-hardened mobile devices and laptops configured specifically for international travel. 	<ul style="list-style-type: none"> Researchers conduct regular international travel for/during this project; and/or Infrequent travel is undertaken to Foreign Country List locations; and/or Researchers travel with University laptops and/or mobile devices. There is limited control over access to research data.



DTCA Exposure	Low Risk	Medium Risk	High Risk
		<ul style="list-style-type: none"> Remote access to research data is controlled. 	
Research partnerships and collaboration	<ul style="list-style-type: none"> Research does not involve international partners, on an institutional or individual (e.g. collaborators outside core project team; personal sponsors) level. 	<ul style="list-style-type: none"> Research involves international partner/s (entities or individuals) from Foreign Country List locations; and Partners' access to project data and information is controlled (e.g. access only granted via process/request); and If partnership is institutional (e.g. with foreign company or university), terms of engagement are clearly set out in a contract. Contract has been reviewed by university legal department. 	<ul style="list-style-type: none"> Project involves international partner/s (entities or individuals from countries not listed on the Foreign Country List; and/or Foreign partners have unmanaged access (e.g. account access to files and data) to project data; and/or Terms of engagement with foreign entities are not clearly defined (e.g. broadly worded Memorandum of Understanding; verbal agreement supplementing signed contract).
Classified information	<ul style="list-style-type: none"> Research does not involve any information subject to security classifications by the Australian Government. 	<ul style="list-style-type: none"> Research involves information classified at the "OFFICIAL: Sensitive" or "PROTECTED" level. 	<ul style="list-style-type: none"> Research involves information classified at the "SECRET" or "TOP SECRET" level.
Research funding	<ul style="list-style-type: none"> Research is funded exclusively by domestic institutions, such as Australian universities, government agencies (excluding defence), or local industry partners. Funding sources are transparent and pose minimal risk to national security or DTCA compliance. 	<ul style="list-style-type: none"> Research receives funding from foreign commercial entities or non-defence government bodies. While funding may support international collaboration, it introduces moderate risk due to potential foreign influence or differing data governance standards. 	<ul style="list-style-type: none"> Research receives funding from foreign commercial entities or non-defence government bodies. While funding may support international collaboration, it introduces moderate risk due to potential foreign influence or differing data governance standards.
End-use	<ul style="list-style-type: none"> Comprehensive due diligence is conducted on all research collaborators and stakeholders. Measures are in place to ensure that DSGL-listed goods, software, or technologies are not transferred to military or Weapons of Mass Destruction (WMD) end users. 	<ul style="list-style-type: none"> Limited or no formal due diligence is conducted on research partners or end users. There is no systematic process to verify whether DSGL-listed items may be accessed by military or WMD-related entities. 	<ul style="list-style-type: none"> Limited or no formal due diligence is conducted on research partners or end users. There is no systematic process to verify whether DSGL-listed items may be accessed by military or WMD-related entities. Researchers may be unaware of their responsibilities under export control regulations.