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**Partner Due Diligence Questionnaire (Level 3)**

**Introduction**

Keele University is passionate about global research and has many global partners. [**UK Research and Innovation**](https://www.ukri.org/about-us/) requires UK research organisations who are working with global partners to have policies and processes in place for a risk-based due diligence process. UK organisations are asked to evidence the due diligence process as part of the funding assurance process and as part of the awarding process for some funding calls.

The due diligence process is about identifying risks to the delivery of the research project and finding ways to mitigate those risks – it is rarely about whether Keele should work with a partner or not.

This due diligence questionnaire is designed to collect the required information for Keele University to conduct its due diligence process in accordance with funders’ terms and conditions. The process has several stages, which do not need to be completed all at the same time. See Figure 1 for an overview of the process.

Your organisation may not be able to answer all the questions, for instance, if you do not have particular policies in place or if a question is not relevant for the project you are working on. If you cannot answer a question, please leave a brief note explaining why it is not applicable. If you have any queries, please contact [**research.global@keele.ac.uk**](mailto:research.global@keele.ac.uk) and a member of the Research and Innovation Support team will be able to help.

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Keele sends due diligence questionnaire to partner.

Stage 1 – Pre-application

Partner completes Stage 1 of due diligence questionnaire and returns it to Keele.

Keele contacts partner to inform whether application successful or not. If successful continue to Stage 2, if not, no further action is required.

Research Project starts

Notification of Award

Stage 2 – Project set-up

Partner completes stage 2 of due diligence questionnaire and returns it to Keele.

Keele completes risk assessment and if any identified risks require action contacts partner to work out suitable mitigations.

Keele drafts collaboration agreement detailing any terms and conditions to be used to mitigate risks.

Both Keele and partner approve terms and conditions by signing the collaboration agreement.

**Figure 1 – Due Diligence Process**

**STAGE 1: TO BE COMPLETED BY PARTNER/APPLICANT BEFORE FUNDING APPLICATION IS SUBMITTED**

Keele University will keep this information on record for the purposes of risk management and compliance.  It may be shared with staff, professional advisors, partners, auditors, regulators and funders as required in the performance and assurance of due diligence connected with this project or other research projects where we are collaborating with you.

Keele University may receive requests for access to this information from UK research institutions and research funders who are considering partnering with you.  Please confirm if you are happy for the information to be shared for these purposes.

I confirm that the information can be shared for these purposes

I do not wish for the information to be shared for these purposes

If you do not provide your consent, we will direct any requesting parties to contact you directly. The information will not be shared with third parties for any other purpose without your prior consent.

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| **1: ORGANISATIONAL GOVERNANCE**  This section is about your organisation as a whole. Please provide information relating to your organisation’s overall structures and processes. | | |
| 1.1 | Name of organisation |  |
| 1.2 | Registered address |  |
| 1.3 | Country where organisation is based |  |
| 1.4 | Registration number and name of registration body (examples of relevant registration bodies are government, tax, corporation, charity, educational authority) |  |
| 1.5 | What is the legal status of the organisation? (for example: public university, private university, charity, private company, non-profit making company, government research organisation, independent research organisation) Please include the date of foundation. *Note: We may be required to ask for evidence of this at a later stage.* |  |
| 1.6 | Is your organisation affiliated to any other organisation? (i.e. is your organisation legally part of a larger organisation or a group of larger organisations / Is your organisation connected to any other organisation in an official capacity / does your organisation share any governance structures with another organisation) If yes, please give details. |  |
| 1.7 | Please provide the name and role/job title of the legal head of the organisation (for example Vice Chancellor / Chief Operating Officer / Chief Executive / Principal). |  |
| 1.8 | Please describe the governance within your organisation relating to research and the structures in which decisions regarding research are made.  *(This may be an individual or a designated group such as a board/council/committee.) You may have an organogram or other document showing how authority for matters relating to research is delegated at different institutional levels. If this information is available on your website then you can provide a link to the web page.* |  |
| 1.9 | Please provide the name of the key contact for research and details of their role within your organisation. This should be a contact that can provide further information on due diligence related matters if required (for example the Director of Research and/or Finance, or a designated spokesperson). |  |
| 1.10 | Please list all the organisations your organisation will need to subcontract with for the delivery of the project? |  |

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| **2: COUNTRY-SPECIFIC INFORMATION**  This section is about any external regulations that your organisation must adhere to. This information is being requested to assist with project planning, for example if there are any additional administrative requirements or fees, these can be built into the project timeline and costings. It is important to understand these requirements at the outset, if applicable, in order to work together to ensure the project can run as smoothly as possible. | | |
| 2.1 | Are there any local, regional, national requirements that may impact on the project e.g. import controls, ethics, research permit etc.? If so, please describe. |  |
| 2.2 | Are there any external fees or charges that the organisation would be subject to in order to be able to carry out externally funded research projects? e.g. fees for ethical review, withholding tax, licenses, cost of insurance policies. |  |

Below is an example of Stage 2 of our due diligence questionnaire. Please look at this so that your organisation is aware of the due diligence questions that we may need you to answer if your application is successful. Please confirm that your organisation can respond to all questions in stage 2, if required?

I confirm that we can respond to the questions in stage two of this form if this application is successful

If you have any queries about what is required for the second stage, please contact [research.global@keele.ac.uk](mailto:research.global@keele.ac.uk) and we can answer any questions you may have so that you are prepared if the project goes ahead.

**STAGE 2: TO BE COMPLETED BY PARTNER ORGANISATION ONLY IF YOUR APPLICATION IS SUCCESSFUL**

**SECTION A – ORGANISATION DETAILS**

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| **3: POLICY, PROCESSES AND PROCEDURES**  Please describe how your organisation manages the following matters. You may have a policy for some or all of these areas, in which case please provide this. If your organisational policies and procedures do not correspond to these specific categories, please describe the processes that you follow that have the closest match or are most relevant to the areas listed.  Please include how staff are made aware of the policies, processes and procedures and how frequently they are reviewed by your organization, including the last review date. | | |
| 3.1 | Anti-fraud, corruption and bribery / whistleblowing  *Refers to reporting systems for wrongdoing in research* |  |
| 3.2 | Travel and subsistence  *How is travel organised – through the institution or personally? Do you have a policy containing acceptable rates and guidance for travellers?* | EXAMPLE |
| 3.3 | Conflict of interest  *Refers to anyone standing to benefit personally or anyone with close relatives or friends who stand to benefit financially from proposed research activities, for example through sub-contracts.*  *Conflicts of interest also refers to the acquisition of knowledge and research by competitors for example, where multiple researchers/research groups are working in the same field of research, or those with military/security sponsorship or links who are working on a civilian project with dual uses.* |  |
| 3.4 | Safeguarding  *Refers to the protection of all research participants, particularly children under the age of 18 and vulnerable adults, from harm and details an appropriate response when harm does occur. The scope of safeguarding covers sexual exploitation, abuse and harassment and broader forms of violence, abuse and harassment of research participants, communities and research staff* |  |
| 3.5 | Health and Safety  *How do you minimise risk of physical injury to anyone involved in a research project?* |  |
| 3.6 | Risk Management  *Refers to the process of identification, mitigation and management of risk which could include travel risk, financial risk and reputational risk etc. both in relation to the project and across the organisation as a whole* | EXAMPLE |
| 3.7 | Ethics  *Linked to safeguarding – ethics refers to how you ensure appropriate care of human or animal participants in research projects* |  |
| 3.8 | Recruitment and Staffing Policy  *What are your processes for recruiting staff, and do these comply with local labour laws? UK Universities are committed to and comply with the* [*UK Modern Slavery Act 2015*](https://www.gov.uk/government/collections/modern-slavery-bill)*, a legislation which fights modern slavery, servitude and forced or compulsory labour and human trafficking and makes provision for the protection of victims. Can you provide information about similar legislations and regulations which apply to your country and can you confirm that your organisation and subcontractors comply with that legislation?* |  |
| 3.9 | Financial Procedures  *Refers to delegation of authority for signing off/approving expenditure, and responsibilities for managing research income and expenditure* |  |
| 3.10 | Research misconduct  *Refers to an individual deliberately or negligently not adhering to accepted practices in any of the above categories* |  |
| 3.11 | Research data management and data protection  *Refers to how research data is recorded, stored and archived securely at your organisation and how research data is shared to contribute to the impact of the research.*  *UK Research Organisations are governed by the General Data Protection Regulations (GDPR) and the* [*Data Protection Act 2018*](https://www.gov.uk/data-protection) *which sets out the rules an organisation must follow when processing personal data.* |  |
| 3.13 | Procurement  *What rules/processes do you have in place/must you follow for making purchases? e.g. of equipment or other materials, necessary to carry out a research project.* | EXAMPLE |

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| **4: RESPONSE TO RISKS AROUND MISCONDUCT, INCLUDING FRAUD**  This section is about understanding your organisation’s processes for resolving issues relating to misconduct and identifying any areas of risk that may impact the delivery of research projects in order to plan appropriate resolutions.  Where information is requested relating to the last three years, this can mean calendar years, financial years, academic years, or similar. You may provide information relating to the annual periods that your organisation normally reports on. | | |
| 4.1 | Please could you confirm if there have been any instances of fraud/attempted fraud or misuse of project funds across the organisation in the last three years? And if so, can you tell us the value and how this was dealt with? |  |
| 4.2 | In the last three years has the organisation been subject to:  a) any claims or disputes by collaborators in relation to research projects  b) been required to repay any research funds  c) been subject to early termination of a research contract where the organisation was at fault?  If so, please give details of the issue(s) and how they were resolved. |  |
| 4.3 | Is the organisation currently or expecting to be involved in any legal proceedings that may impact on achieving the objectives of the project, or result in reputational damage to the organisation and/or the individuals involved in the project? |  |
| 4.4 | If you answered ‘yes’ to any of the questions above, can you provide the name of the key contact and details of their role in your organisation that can provide further information? |  |

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| **5: ABILITY TO DELIVER: GRANT ADMINISTRATION** | | |
| 5.1 | Please provide a brief outline of the three biggest research innovation and/or teaching projects (by financial value to your organisation) that your organisation is currently or was recently (in the last three years) working on. | EXAMPLE |
| 5.2 | Does your organisation have a team(s) that provide administrative support service to research projects? What services do they provide? E.g. finance monitoring, contract management etc. |  |
| 5.3 | Who has overall responsibility for the management of research grants across the organisation? This could be an individual or a designated group such as a research office. |  |
| 5.4.1 | How is expenditure on externally funded projects monitored? This includes expenditure relating to staff, travel, equipment and materials purchasing, and invoices. |  |
| 5.4.2 | How do you monitor finances for individual projects separately from the rest of the organisation? E.g. will this be a specific project number / separate bank account? |  |
| 5.5 | You will be required to adhere to funder reporting requirements for individual projects. This may include quarterly detailed transaction listings for all expenditure incurred using grant funds, scanned receipts for transactions, and evidence of staff hours worked on the project. Are you able to comply with these reporting requirements if necessary? |  |
| 5.6 | How does your organisation record and evidence the number of hours worked by staff on externally funded projects e.g. timesheets? If timesheets are used, please provide an example. |  |
| 5.7 | If different to Question 1.9, please provide the name of the key contact and details of their role for the organisation that can provide further information if required? This could be an individual or a designated office. |  |

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| **6: ABILITY TO DELIVER: FINANCE** | | |
| 6.1.1 | We are required to understand the organisation’s financial position.  Are you able to provide copies of audited financial reports for the last three financial years? Please provide electronic copies or a link to the web page where they are published. | EXAMPLE |
| 6.1.2 | If no, or your organisation has been established for less than three years, can you provide your most recent finalised financial reports? |  |
| 6.2 | Does the organisation have a bank account held in the organisation’s name, which can receive grant funds in GBP? | Yes  No – which currency/currencies are you able to transact in: |
| 6.3 | Does your organisation need prior authorisation from another body or government in order to accept and/or disburse funds relating to research, innovation or teaching projects? If yes, please give details of the circumstances in which this is applicable, the process and timeline for authorisation. |  |
| 6.4 | How does your organisation manage foreign currency exchange risks where the income is in a different currency than the expenditure? |  |
| 6.5 | Does your organisation have an internal audit function? | Yes  No |
| 6.6 | Has your organisation been subjected to any internal/external audits on post award financial research management within the last three years? If not, when was the last time an internal or external audit was carried out, and by who? |  |
| 6.7 | Does your organisation hold public liability insurance that covers work relating to externally funded research projects, and to what value or limit? If yes, please give the expiry date and details of the renewal process if applicable. If no, is this cover provided in another way? |  |
| 6.8 | Does your organisation hold professional indemnity insurance that extends beyond the life of the project and to what value or limit? |  |
| 6.10 | If different to Questions 1.9, can you please provide the name of the key contact and details of their role for the organisation that can provide further information if required? |  |

EXAMPLE

**SECTION B: PROJECT DETAILS**

This section is exclusively about the research project in question. Please answer these questions with information specific to the way the project will be managed. Whereas Section A may be completed once and updated when appropriate, it is expected that Section B is completed for each project undertaken with a new or existing partner.

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| **7: PROJECT GOVERNANCE** | | |
| 7.1 | Please describe the research/academic governance and project management arrangements that are specific to this project, including the names and roles of the person/people responsible for academic management and administrative management, if different. Please include how project expenditure is authorised, processed and paid, and who is responsible at each stage. |  |
| 7.2 | Please can you provide the names and roles of the following key personnel that are specific to this project, including email and phone number?   * + 1. Persons responsible for financial management and reporting | Name: Role: E-mail: Phone number: |
| * + 1. Key legal contact | Name: Role: E-mail: Phone number: |
| * + 1. Project manager if applicable (or other administrative support for the project) | Name: Role: E-mail: Phone number: |
| 7.3 | Please describe the physical infrastructure in place to deliver the project e.g. will the project have access to the appropriate laboratories, buildings and other facilities. |  |
| 7.4 | If applicable, please provide details of possible conflicts of interest from key personnel, or any of their family or people living within the same household and how this will be managed. |  |
| 7.5 | What ethical review will this project be subject to? Please provide details of any relevant policies/procedures for research ethics.  EXAMPLE |  |
| 7.6 | Research misconduct - have any of the key personnel been subject to an investigation into research misconduct where the allegations have been upheld? |  |
| 7.7 | Have any of the key personnel had publications retracted? | Yes  No |
| 7.8 | Do you have any other comments or is there anything else that you feel the project team should be made aware of? |  |

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| **8: SUB-CONTRACT MANAGEMENT**  **T**his is only relevant if your organisation is sub-contracting as part of the research project | | |
| 8.1 | Please identify any intended third parties/subcontractors contributing to this project. **If you will not use sub-contractors then you do not need to answer the remaining questions in this section.** |  |
| 8.2 | Please identify which of the third parties/subcontractors named above are receiving funds and the amount which will be disbursed to each partner |  |
| 8.3 | Please could you outline any due diligence that you undertake on your sub-contractors to assess their suitability to carry out the work required.  *Note: This may be a specific policy. If you do not have a policy, please describe your approach to recruiting and managing sub-contractors* |  |
| 8.4 | If applicable, is your organisation able to pay sub-contractors who are based outside of your own country? |  |
| 8.5 | Please provide the names and details of the person(s) responsible for the selection and management of subcontractors, who can provide further information, if required. | EXAMPLE |
| 8.6 | 8.6.1 UK Universities are committed to and comply with the UK Counter-Terrorism (Sanctions) (EU Exit) Regulations 2019 that further the prevention of terrorism in the UK or elsewhere and protect UK national security interests. It is through this regime that the UK implements its international obligations under UN Security Council Resolution 1373.  Can you provide information about similar legislations and regulations which apply to your country and can you confirm that your organisation and subcontractors comply with that legislation? |  |
| 8.6.1 | Do you sub-contract to any partners who are located in areas where there is a high risk of funding being used to fund terrorism or other illegal activities? If yes, what steps does your organisation take to prevent this from happening? |  |

**DOCUMENT CHECKLIST**

Please complete this table to indicate whether you have included the documentation required as part of this assessment.

If you are not able to supply certain documents (for instance a policy not in existence in your organisation) please indicate why this is the case.

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| **Document** | **Enclosed** | | **Comments** |
| **Y** | **N** |
| Anti-fraud, corruption & bribery policy |  |  |  |
| Travel & subsistence policy |  |  |  |
| Conflict of interest policy |  |  |  |
| Safeguarding policy |  |  |  |
| Health and Safety Policy |  |  |  |
| Risk Management Policy |  |  |  |
| Ethics Policy |  |  |  |
| Financial Procedures |  |  |  |
| Research Misconduct Policy |  |  |  |
| Data Management/Data Protection Policy |  |  |  |
| Procurement Policy |  |  |  |
| Copy of collaboration agreement/MOU used when collaborating/sub-contracting |  |  |  |
| Last 3 years audited accounts |  |  |  |
| Bank ‘Letter of Good Standing’ |  |  |  |
| License to receive international funding (if relevant) |  |  |  |
| Most recent internal audit report |  |  |  |
| Internal audit report on grant management |  |  |  |

EXAMPLE

**DECLARATION**

All research grants are subject to the funder Terms and Conditions. If for any reason you cannot adhere to any of the conditions, please state which ones and the reason why below:

The information provided in this questionnaire should be a true representation of your organisation. If false information has been provided there is a chance this will affect your funding going forwards.

**To confirm the above please sign below**.

Signed …………………………………………………………………..

Date …………………………………………………………………..

Position …………………………………………………………………..