Case study three: Staff visitors

An international graduate research student based in the UK maintained connections with a research group at a university in their home country.

The student sought permission to deliver a more formal partnership between the two research labs and offered to facilitate this. At the time, the research was not subject to export controls and, due to its initial small scale, the new partnership was exempt from sophisticated internal due diligence and oversight.

Following the establishment of the partnership, the student invited colleagues from the international lab to visit the UK institution, and made travel and other arrangements, and assisted with interpretation during their stay. About a year into the partnership, a UK research supervisor became concerned that the relationship was very one-sided. Despite the overseas lab being extremely well-funded, it was slow to follow up on emerging research and technology. Following a reassessment of the relationship, the supervisor realised that the research would likely become subject to export control restrictions and so terminated the partnership.

UK university staff later discovered that, during their visit, the delegation had taken detailed photographs of lab equipment for the purposes of reproducing the lab at their home institution. Inadequate supervision meant this breach was not identified at the time and the relationship was allowed to continue.

Learning points

Overseas partners may attempt to access the early-stage development of technology and research before it is subject to export control legislation.

Robust due diligence is necessary for all international partnerships, and may involve further investigation of the proposed partner and their identifiable associations to establish the size and scale of their operations.

There is a need for strict protocols for all visiting staff and students, conducted prior to campus visits and tours.

Visa invitation letters should only be authorised by suitably senior members of staff, not students.

As an exporter, you need to comply with strategic export controls and ensure that without an appropriate export licence is in place, where this is necessary. It is also possible that a compliance inspector from the Export Control Joint Unit (ECJU) will identify an irregularity during a compliance audit. If this happens, it is very important to report the irregularity (sometimes known as 'voluntary disclosure') to HM Revenue & Customs (HMRC) as soon as possible, as they are responsible for the enforcement of strategic export controls. If the irregularity was found on an ECJU-compliance audit, the compliance inspector will have informed HMRC and you are strongly advised to do the same.