

**TRUSTED  
RESEARCH**

---

# Implementation – roundtable exercise



National Protective  
Security Authority



National Cyber  
Security Centre

**The scenario below can be tailored to the specific institution and field of research. We have designed this exercise to be relevant to everyone at an institution, from researchers, to university leadership to research services staff.**

After familiarising yourself with the exercise, those delivering this to colleagues may wish to adapt the content to make it more relevant to the specific audience you are addressing.

## **Participants**

Participants should only have sight of the ‘scenario questions’. However, the exercise facilitator should allow the audience time to identify the key considerations for each stage before revealing them.

## **Facilitator**

The roundtable exercise facilitator should use the ‘facilitator questions’ to enable full discussions around each stage of the exercise. The ‘facilitator questions’ may be necessary in instances where participants are unable to identify all the research security risk considerations using only the ‘scenario questions’.

The facilitator should then use the ‘facilitator prompts’ to demonstrate the institutional support and relevant policies available to participants if they have not yet shown an awareness of them during the discussion.

The facilitator should discuss each stage of the exercise with the participants to reach a successful conclusion to each stage before moving onto the next part of the exercise.

Preparing the ‘facilitator prompts’ will enable the institution’s research office to recognise where existing policies and processes can be deployed and highlight instances where the institution may require additional policies and/or processes to be put in place to effectively mitigate research security issues. The exercise aims to raise awareness of Trusted Research-related risks and appropriate mitigations alongside an institution’s own policies and governance.



# Part 1

**You are an academic at [insert your institution here] specialising in the field of [insert field here]. You receive an email from an academic based in [insert overseas country here considered high risk under your institution’s risk framework] who has a keen interest in your research papers on [insert topic here].**

They mention that you briefly studied together at a UK university and would be keen to re-connect. They suggest a conference call to catch-up, which you accept.

## Scenario questions

- What do you think you should be considering from a Trusted Research perspective?
- Are there any issues or considerations that would be cause for concern in this sort of scenario?
- If you had concerns, who would you raise them with?
- Would you consult with anyone in your department or institution before following up on this request?
- Are there any circumstances where you would not follow up on this request?



## Facilitator questions

- How certain are you that the overseas academic is who they say they are?
  - Have you sought any information from their online profiles to corroborate their identity?
- What do you know about the institution(s) that they work for?
- What do you know about their source(s) of funding?
- Are there any sensitivities related to your area of research?
  - Is your research military related or does it have a dual-use application?
- Are there any sensitivities or causes of concern relating to their area of research?
- Are there any legal requirements you need to consider based on the country the academic is based in regarding the exchange of information?
  - For example, sanctions, embargoes, export control, the National Security and Investment Act.
  - Are there any other country-related considerations?
- If the overseas academic collaborates with third parties in other countries, do any risks arise regarding the circumvention of UK laws and/or sanctions?
- If the overseas academic collaborates with third parties in other countries, will this contradict any current contractual obligations you must uphold?
- Is this a confidential conversation, and if so, how have you ensured it is confidential?
  - For a verbal conversation to be confidential, typically it will need to be rendered into words. Consideration should be given to entering into a written confidentiality or non-disclosure agreement at the outset of a collaboration and legal advice and/or advice from the institution may be required. Exact requirements will be contingent on the laws in the relevant jurisdiction(s).
  - If you communicate via email, you should consult your legal department for a statement to include in the header of the email stating the confidential nature of the communication.



## **Facilitator prompts**

- The institution has a policy on collaborations, [insert policy here], which defines informal and formal collaborations. The policy also states the point at which the institution must be notified of collaborations.
  - The institution's training policy, [insert policy here] outlines the mandatory requirement for all staff to read the Export Control Joint Unit (ECJU) export control guidance for academia.<sup>1</sup>
  - The institution has a defined process for conducting due diligence checks on partners and their associated institutions: [insert process here]. This process recommends seeking advice from the institution's research office and, in complex cases, the Research Collaboration Advice Team (RCAT).
- Institutions should ensure that they educate and protect their most vulnerable staff and students from potentially exploitative approaches. Staff and students may be more vulnerable at the start of their careers, when they may have less experience managing research security risks, or if they are on insecure or short contracts in which they need to meet funding targets.

1 <https://www.gov.uk/guidance/export-controls-applying-to-academic-research>



# Part 2

**Prior to the call, you establish what you can and cannot discuss with the academic, taking into consideration institutional policies, legal obligations, contractual requirements, confidentiality considerations and disclosure.**

During the conference call you outline your current work at the university, which includes undertaking cutting-edge research in [insert area here]. You mention that the research is sponsored by a UK company but do not provide any further details.

The overseas academic is intrigued by your research portfolio and suggests that you keep in touch to update each other on new developments in your respective research portfolios and to share academic contacts where relevant.

## Scenario questions

- What do you think you should be considering from a Trusted Research perspective?
- Are there any issues or considerations that would be cause for concern in this sort of scenario?
- If you had concerns, who would you raise them with?
- Would you consult with anyone before following up on this request? If so, who would you consult?
- Are there any circumstances where you would not follow up on this request?
- How would you classify your working relationship with the overseas academic at this stage?



## Facilitator questions

- Are there any sensitivities related to the research developments you may wish to share?
- Are there any contractual requirements which you have already agreed to, for example with industry partners or funding bodies, that need to be considered?
  - Does the agreement you have with the UK company place any restrictions upon discussing the research?
- Is it necessary to obtain approval from the university prior to sharing research developments relating to your wider portfolio?
  - Before sharing research developments, particularly if you intend to share intellectual property (IP), you should consult your institution's policy on IP ownership to determine the owner of the IP and any restrictions imposed on the sharing of IP.
  - You should follow the institutional IP management process which should include identifying IP, protecting IP, contractual terms and conditions, wider institutional policies and disclosure.
- Is the sharing of research developments and/or IP subject to export controls?
- Would you intend for the sharing of research developments to be confidential, and if so, how would you ensure they are confidential?
  - For a verbal conversation to be confidential, typically it will need to be rendered into words. Consideration should be given to entering into a written confidentiality or non-disclosure agreement at the outset of a collaboration and legal advice and/or advice from the institution may be required. Exact requirements will be contingent on the laws in the relevant jurisdiction(s).
  - If you communicate via email, you should consult your legal department for a statement to include in the header of the email stating the confidential nature of the communication.
- Is there a requirement to obtain permission from individuals prior to sharing their contact details?
  - Are there any Data Protection Act 2018 implications you need to consider?
  - Does your institution have a policy or process which must be followed when sharing colleagues' contact details?



## **Facilitator prompts**

- The institution's policy on collaborations, [insert policy here], outlines the process that must be followed when setting up and managing collaborations, including the point at which a written agreement is required to formally recognise and set out the relevant terms and conditions of the partnership.
- The ownership of IP developed while staff and/or students are employed by the university is defined in the [insert policy here] policy.
- The [insert department/office here] provides training on how to protect IP to all staff and to students producing research, and directs staff and students to the IPO's support tools.<sup>2</sup>
- The institution has a defined process for conducting due diligence checks prior to sharing research/ data/information: [insert process here]. This process includes ensuring all legal obligations are met and consulting the RCAT where necessary.
- The institution's policy on data protection outlines the process which staff and/or students must undertake when they are requested to share a colleague's contact details.

<sup>2</sup> <https://www.ipo.gov.uk/ip-support/welcome>



# Part 3

## **Six months into your relationship with the overseas academic, they present you with a proposal on behalf of their institution.**

The proposal is to undertake research to fulfil similar research questions to those for which you are currently undertaking cutting-edge research with funding from a UK company. The overseas university is offering significant funding.

There is no clause in the proposal requiring you to end the research or funding agreement with the UK company.

### **Scenario questions**

- What do you think you should be considering from a Trusted Research perspective?
- What other information would you need to know about the proposal?
- Are there any issues or considerations that would be cause for concern in this sort of scenario?
- If you had concerns, who would you raise them with?
- Would you consult with anyone before following up on this request? If so, who would you consult?
- Are there any circumstances in which you would decline the proposal?



## Facilitator questions

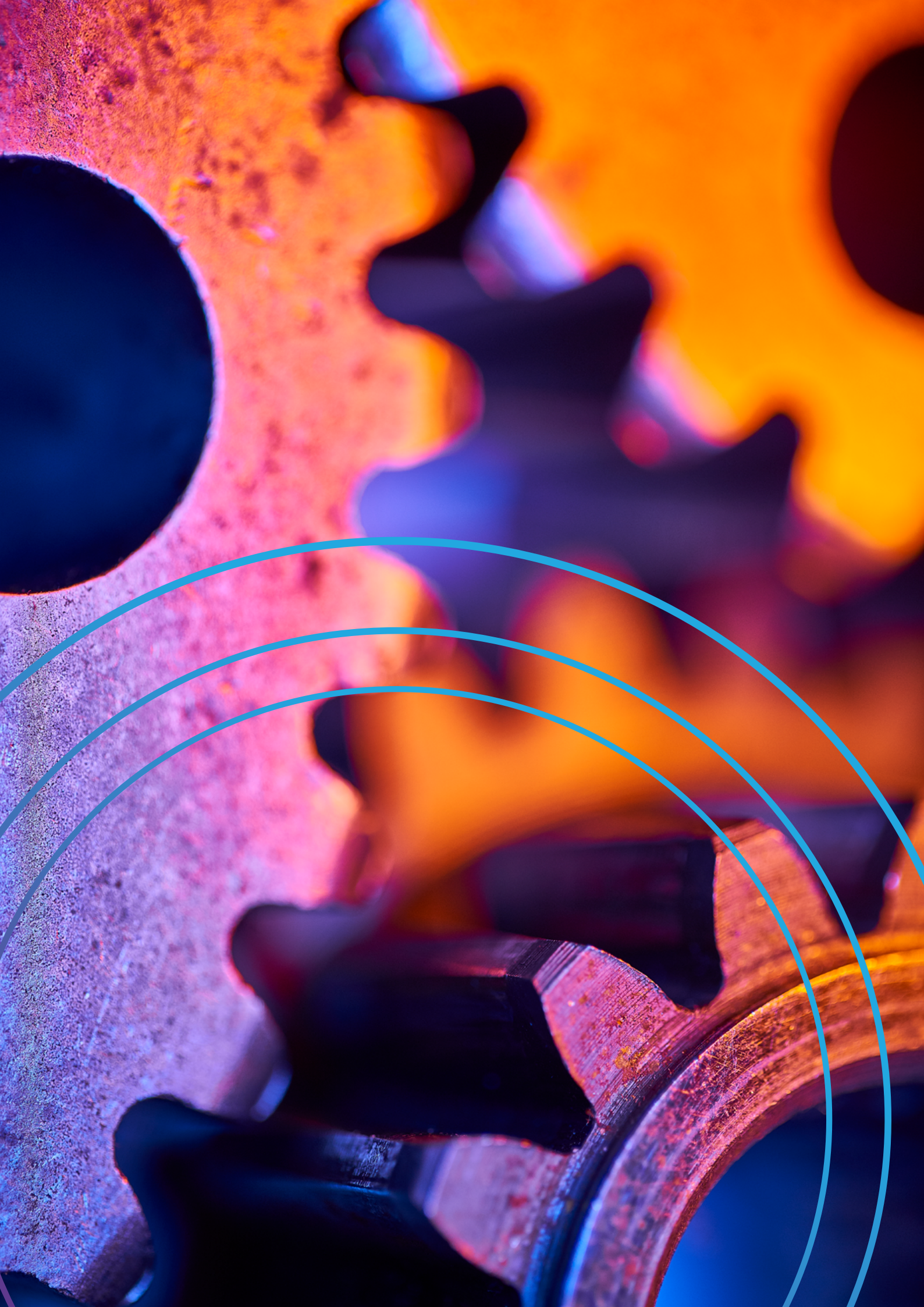
- What is the process for considering this proposal?
  - Who is consulted?
  - Who are the key decision makers?
  - What institutional issues are considered before progressing with a decision?
    - What are the possible benefits of this proposal that make it attractive to the university?
    - What are the possible disbenefits of this proposal that make it unattractive to the university?
    - Are there any university policy constraints on undertaking your research with this partner?
    - Do the values and intentions of the overseas institution align with your own?
      - Considering this question may help you to establish whether an overseas institution may be more likely to act, or be compelled to act, in a way that is contrary to the UK's national security.
- Would proceeding with this partner raise a potential conflict of interest/commitment with existing research partners or funders?
- Are there any long-term factors to consider regarding collaborating with this overseas partner?
  - For example, would collaborating and/or receiving funding from this partner compromise your ability to work with other institutions in the future?
- Have you conducted a risk assessment?
  - This document should be dynamic and evolve to capture changes which occur through the decision-making process and, if accepted, the lifecycle of the collaboration.
- How is the proposal accepted or declined?
- Do you need to discuss the proposal with the UK company funding your research?
  - What are the terms and conditions of the funding you are currently receiving?

- Do you have any contractual obligations which must be upheld?
- Who is the source of the funding the overseas university is offering to provide?
  - Are any third parties involved?



## Facilitator prompts

- At [insert institution name here] the approach to the governance of Trusted Research risk is outlined in [insert Trusted Research governance policy/process here].
- The Trusted Research governance policy/process names [insert relevant individual(s) here] as the policy lead for decision making on issues of security concern.
- The institution's risk management policy/process, [insert policy/process here] states that research security risks should be escalated to [insert individual(s)/office here] for high-risk collaborations. In complex cases, the policy/process states that the [insert board name here] will meet to determine appropriate mitigations and consult the RCAT where necessary.
- The institution has a defined process for conducting due diligence checks on partners: [insert process here], which includes consultation with RCAT for complex and/or perceived high-risk cases.
- The university's policy/process for receiving funding, [insert policy name here], requires that due diligence research is undertaken on the source of the funding by [insert individual(s)/office responsible].
- The university has a conflict of interest/commitment policy, [insert policy name here], which must be consulted prior to the creation of new partnerships.
- The institution's [insert policy name(s) here], states that all collaborative work must align with the institution's aims.



# Part 4

**Through consultation with the UK company and the overseas university, you have refined the research questions for the collaboration with the overseas university. They now fulfil the overseas university’s requirements, while also avoiding a conflict of interest/commitment or contractual breach with the UK partner.**

As a result, the proposal progresses, and the overseas university provide more details on the terms of engagement that it would like to agree.

The terms include a request for joint ownership of the IP developed during the collaboration.

## Scenario questions

- What do you think you should be considering from a Trusted Research perspective?
- Are there any issues or considerations that would be cause for concern in this sort of scenario?
- If you had concerns, who would you raise them with?
- Would you consult with anyone before following up on this request? If so, who would you consult?
- What is your institution’s stance on IP ownership?



## Facilitator questions

- What is the process for considering these terms?
  - Who is consulted?
  - Who are the key decision makers?
  - What institutional issues are considered before progressing with a decision?
    - What are the possible benefits of these terms that make them attractive to the university?
    - What are the possible disbenefits of these terms that make them unattractive to the university?
    - Are there any university policy constraints regarding these terms?
    - Are there any long-term factors to consider regarding these terms?
      - For example, future commercialisation opportunities regarding the IP.
- Have you conducted a risk assessment?
  - This document should be dynamic and evolve to capture changes which occur through the decision-making process and, if accepted, the lifecycle of the collaboration.
- How are the terms accepted, declined or re-negotiated?



## **Facilitator prompts**

- The university has a conflict of interest/commitment policy, [insert policy name here], which must be consulted prior to the creation of new partnerships.
- The ownership of IP developed while staff and/or students are employed by the university is defined in the [insert policy here] policy.
- The institution should follow a defined process for negotiating IP ownership with partners.
  - This process should follow the institutional IP management process which should include identifying IP, protecting IP, contractual terms and conditions, wider institutional policies and disclosure. The institution should also consider how IP will be stored.
  - As part of this process, the institution should consider the long-term vs short-term benefits, recognition of the institution and associated academic(s), financial merit and future opportunities for commercialisation.

## **During the IP negotiations, your institution and the overseas university agree:**

- a) to joint IP ownership
- b) to the UK university having IP ownership but providing the overseas university with first refusal for licensing exclusivity
- c) [Insert other arrangement here]

Note: your previous discussions will have led you to the decision made here.

LEARNING RESOURCE



# Part 5

## **The overseas university states that they would like the research to be undertaken at the UK university.**

There is a vacant site on campus appropriate for the type of research that needs to be undertaken. It is located next-door to the facility used to undertake research for the UK company, which addresses similar research questions.

### **Scenario questions**

- What do you think you should be considering from a Trusted Research perspective?
- Are there any issues or considerations that would be cause for concern in this sort of scenario?
- If you had concerns, who would you raise them with?
- Would you consult with anyone before following up on this request? If so, who would you consult?



## **Facilitator questions**

- Who is consulted on the decision to occupy the facility next door to where similar research is undertaken for the UK company?
  - Who are the key decision makers?
  - Do you need to consult the terms and conditions of your agreement with the UK company to ensure you do not breach your contractual obligations?
- What are the key considerations in making this decision?
  - How will you prevent information transfer between the two facilities in close proximity?
    - Are you able to put suitable access controls in place?
    - How will you manage the flow of people between the two facilities?
    - Are there any overlooking points between the two facilities?
    - Are you able to segregate the network(s) used in the two facilities?
- As the research is being undertaken in the UK, will export licences be required to communicate the research outcomes with your overseas partner?



## Facilitator prompts

- The institution's conflict of interest/commitment policy, [insert policy here], outlines the requirement to de-conflict contractual obligations as the responsibility of [insert responsible individual(s)/office].
- The institution is aware of the range of guidance available from the National Protective Security Authority (NPSA) and refers staff, and students where relevant, to personnel<sup>3</sup> and physical<sup>4</sup> security advice when necessary.
- The [insert relevant individual(s)/department here] advises staff on the need for export licences, in conjunction with advice from the RCAT and the ECJU.

3 <https://www.npsa.gov.uk/personnel-and-people-security>

4 <https://www.npsa.gov.uk/building-protection>



# Part 6

**As the research will be undertaken in the UK, the overseas university want to send some academics from their institution to the UK as visiting research fellows for the duration of the collaboration.**

## Scenario questions

- Considering the above, what do you think you should be considering from a Trusted Research perspective?
- Are there any issues or considerations that would be cause for concern in this sort of scenario?
- If you had concerns, who would you raise them with?
- Would you consult with anyone before following up on this request? If so, who would you consult?
- Are there any potential legal obligations you should consider?



## **Facilitator questions**

- What is the process for bringing visiting research fellows from overseas territories to the university?
  - Who is consulted on their appointment?
  - Who approves their appointment?
  - What contracts or agreements for their appointment are put in place?
  - Are visiting research fellows recorded in the institution's HR system?
  - Who takes responsibility for managing the onboarding process?
  - Are there any institutional processes the visiting research fellows must complete prior to coming to the university?
  - Would hosting the visiting research fellows raise any potential conflict of interest/commitment with existing partners or funders?
- What legal obligations do you need to consider regarding the visiting research fellows?
- Are there any complex considerations which require input from external bodies (e.g. RCAT)?



## **Facilitator prompts**

- Within the institution, the [insert department/office here] takes responsibility for ensuring that overseas visitors complete all necessary entry requirements to work at the UK university (e.g. ATAS, visas). The [insert department/office here] documents the completion of these legal obligations and the accompanying documentation in [insert document name(s) here].
- The institution has the following policy/process for visiting research fellows, [insert policy/process name here], which takes a risk-based approach to fellows from ‘high risk’ countries. The policy/process requires that due diligence checks are undertaken for all visiting research fellows.
- The institution uses the following process [insert process here] to conduct due diligence into visiting research fellows to ensure that the institution knows its partners. This process includes consultation with RCAT for complex and/or perceived high-risk cases.
- As part of the onboarding process, the [insert department/office here] provides induction training on research security risk and security behaviours.



# Part 7

The visiting research fellows arrive at [insert your institution here] and request access to your institution's IT infrastructure to facilitate research collaboration, data sharing, internal communications at the UK university, and contact with their home university.

## Scenario questions

- What do you think you should be considering from a Trusted Research perspective?
- Are there any issues or considerations that would be cause for concern in this sort of scenario?
- If you had concerns, who would you raise them with?
- Would you consult with anyone before following up on this request? If so, who would you consult?



## **Facilitator questions**

- Who is consulted on the decision to grant IT access?
- What approach is used in deciding whether to grant access?
  - Are there any access restrictions?



## **Facilitator prompts**

- The institution's information management policy, [insert policy name here], dictates the scope of network access appropriate to job roles/departments. The [insert department here] is able to grant visiting research fellows restricted access to the parts of the network required.
- The institution has a defined list of 'high risk' countries: [insert document name(s) here – note some institutions may wish to restrict access to this type of document]. In conjunction with this list, an information management policy [insert policy name here] defines the type of network access granted to staff from countries perceived as 'higher risk'.
- Within the institution, the [insert department/office here] provides training to visiting research fellows on how to use the university IT systems safely and compliantly.
- Within the institution, the [insert department/office here] provides training on export control.
  - For visiting research fellows from overseas, this includes a specific emphasis on the necessary procedures that need to be followed to export knowledge, items or data to their home institution based overseas.



## Part 8

**A few months into the collaboration, a group of academics from the UK university [insert your institution here] and the visiting research fellows travel to the overseas university to give a presentation on the research collaboration to the executive council of the overseas university.**

### Scenario questions

- What do you think you should be considering from a Trusted Research perspective?
- Are there any issues or considerations that would be cause for concern in this sort of scenario?
- If you had concerns, who would you raise them with?
- Would you consult with anyone before undertaking overseas travel? If so, who would you consult?
- What legal obligations do you need to consider?



## Facilitator questions

- What is the process for agreeing the travel?
  - Who is consulted and who approves the travel?
  - What are the key considerations for visiting the overseas university?
- What advice, training and support are provided to those travelling?
- What are you taking for the presentation?
  - Is it subject to export control legislation?
  - Where relevant, have you considered IP protections and disclosure?
- Are you taking any devices?
  - Do they contain additional research/data which may be subject to export control?
- What expectations does the overseas university have about the level of information and detail that will be shared?

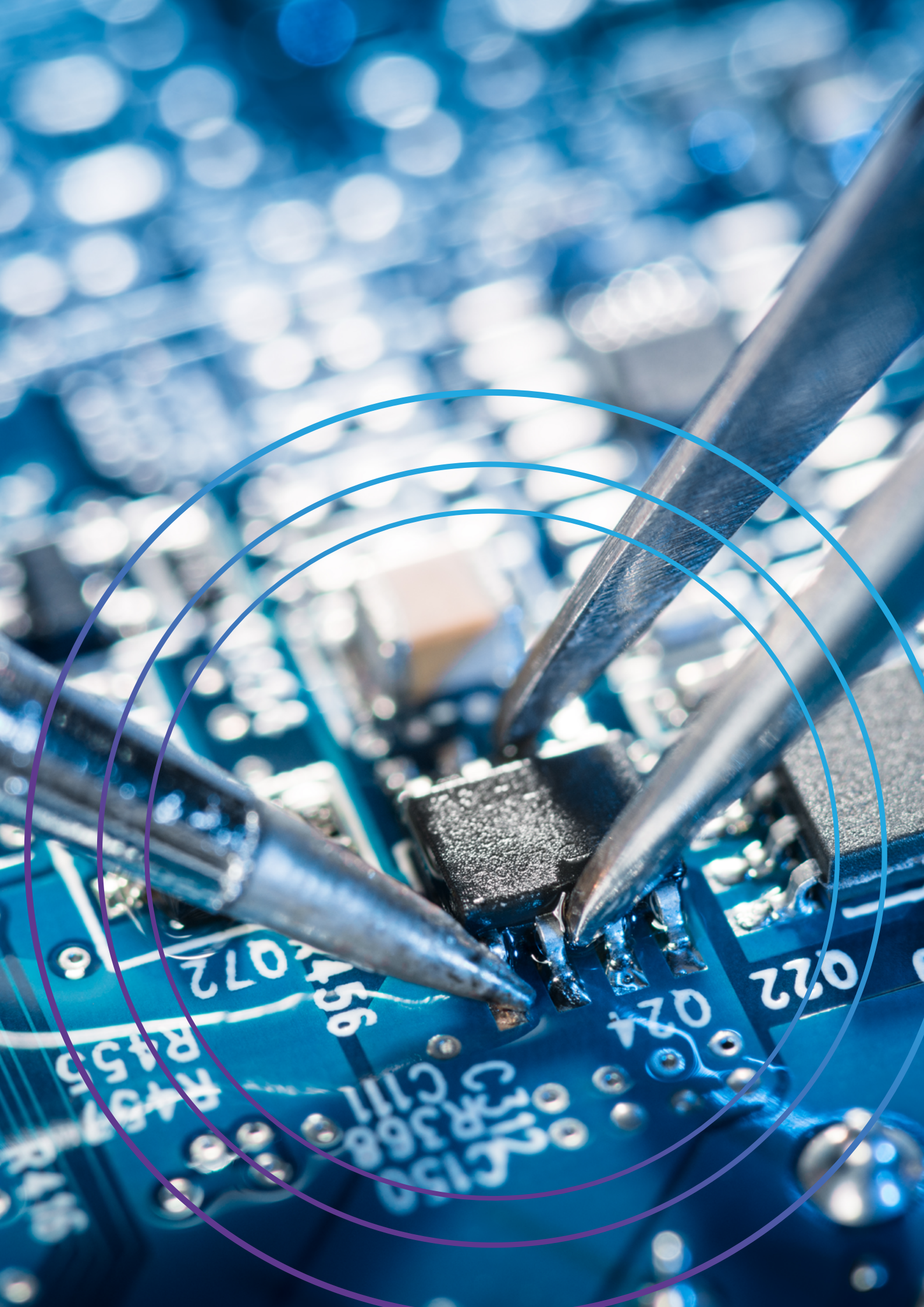


## Facilitator prompts

- The university's policy on overseas travel, [insert policy here], addresses the following:
  - taking research abroad
  - taking devices abroad (including 'clean devices')
  - maintaining contact while overseas
  - accessing the UK university infrastructure while overseas
  - conducting a country-specific risk assessment
  - travel insurance
  - meeting legal obligations (e.g. visa applications, export control)
  - conducting research on the destination's politics, culture, laws, approach to academic freedom and potentially contentious issues with the UK

- The travel policy also states that [insert relevant individual(s)/office here] is responsible for recording all travel and overseas engagements.
- The institution has a clear process for approving travel, which can be found [insert information on where the approval process can be found].
- Within the institution, the [insert department/office here] provides travel briefings for academics in preparation for meetings, conferences, presentations etc. If the country is designated ‘high risk’ by the institution, the briefing will include the relevant legislative and geopolitical risks.
- The institution promotes NPSA’s Countries and Conferences<sup>5</sup> guidance for advice on the following platforms: [insert platform(s) here].

5 <https://www.npsa.gov.uk/specialised-guidance/trusted-research/trusted-research-countries-and-conferences>



Q72

R456

Q22

Q24

C312  
C3615  
C111  
C168

R455

R454

## Part 9

**During the visit to the overseas university, one of the UK university academics is approached by an individual claiming to represent the overseas country’s science and technology government department.**

The representative is keen to arrange further meetings and has clients who would like to discuss the research that the academic undertakes in the UK. The representative offers to meet the academic’s travel expenses for further meetings and to provide compensation for their time.

The academic feels uneasy about the proposal and the nature of the approach.

### Scenario questions

- What do you think you should be considering from a Trusted Research perspective?
- Are there any issues or considerations that would be cause for concern in this sort of scenario?
- If you had concerns, who would you raise them with?
- Would you consult with anyone before following up on this approach? If so, who would you consult?



## Facilitator questions

- In this instance, as the academic feels uneasy about the approach, how would they report this interaction?
- If the academic felt inclined to share information during this approach, what would they need to consider?
  - For example, any existing contractual obligations they need to uphold, conflict of interest/commitment, IP ownership, disclosure and export control.
- If the academic felt inclined to accept the offer to work with the overseas government, what policies would they need to consult?
  - For example, conflict of interest/commitment and policies regarding additional appointments.



## Facilitator prompts

- The institution has a process in place, documented in [insert process document(s) here] for reporting engagements which cause concern to staff and students, while overseas and in the UK. Entries are reviewed [insert regularity of review] by [insert office responsible for reviews].
  - Where appropriate, the institution may wish to communicate repeat or high-risk perpetrators of suspicious approaches/uneasy engagements to staff and/or students.
  - In the event that these approaches present a risk to national security, the policy outlines the need for escalation to the RCAT and NPSA.
- The institution has a policy, [insert policy here] which contains guidance on holding additional appointments, both in the UK and overseas. This policy is informed by the institution's values and its risk appetite.

- The institution has a policy on receiving gifts, hospitality and expense payments from outside institutions: [insert policy name here].
- Within the institution, the [insert department/office here] provides travel briefings for academics in preparation for meetings, conferences, presentations etc. As part of these briefings, staff are made aware of the types of adverse approaches used by state actors to solicit information on research, and they are advised on how to respond to these approaches.



# Part 10

**Following the presentation to the overseas university, the visiting research fellows suggest arranging a conference in the UK on [insert area of research here].**

The visiting research fellows invite academics from across the country where the overseas university is based and invite academics from universities across the UK specialising in [insert relevant field here] to speak at the conference.

## Scenario questions

- What do you think you should be considering from a Trusted Research perspective?
- Are there any issues or considerations that would be cause for concern in this sort of scenario?
- If you had concerns, who would you raise them with?
- Would you consult with anyone before following up on this suggestion? If so, who would you consult?



## Facilitator questions

- What is the process for arranging the conference?
  - Who is involved?
  - What level of approval is required?
  - Where will the conference be held?
    - Depending on the location, are any access controls required?
  - Is there a requirement to undertake due diligence checks on the attendees?
  - Do you have any responsibility for the overseas academics attending the conference?
  - Is any advice and guidance provided to the academics taking part?
- How will IP considerations, such as disclosure, be addressed?
- Will there be any additional activities which take place outside of the conference? If so, do you need to undertake any additional processes (e.g. risk assessment, legal compliance etc.)?
  - For example, will they visit any university facilities or meet with any university staff and/or students?



## **Facilitator prompts**

- The institution promotes NPSA’s Countries and Conferences<sup>6</sup> guidance on the following platforms: [insert platform(s) here].
  - The institution has a defined process for conducting due diligence checks on conference attendees: [insert process here]. This process includes consultation with RCAT for complex and/or perceived high-risk cases.
  - The [insert relevant individual(s)/ department here] can provide guidance on what information/data should or should not be shared with partners, taking into consideration legal compliance and institutional risk appetite.
- In this instance, depending on the overseas country and where it sits within the institutional risk thresholds, although export control is not required as the information is not leaving the UK, the institution may decide to only share information that would not be subject to export control if it were leaving the UK.
  - It is good practice to have materials that are being shared checked by a patent attorney to ensure disclosure is not being made inadvertently.

6 [https://www.npsa.gov.uk/system/files/trusted-research-countries-conferences\\_1.pdf](https://www.npsa.gov.uk/system/files/trusted-research-countries-conferences_1.pdf)

## **Disclaimer**

This resource has been prepared by NPSA and NCSC and is intended to aid academic institutions to help them understand and mitigate security risks arising from research, in combination with additional resources and the application of institutions' own judgement. This document is provided on an information basis only, and while NPSA and NCSC have used all reasonable care in producing it, NPSA and NCSC provides no warranty as to its accuracy or completeness.

It is important to emphasise that no security measures are proof against all threats. You remain entirely responsible for the security of your own sites and/or business, and compliance with any applicable law and regulations. You must use your own judgement as to whether and how to implement our recommendations, seeking your own legal/professional advice as required.

To the fullest extent permitted by law, NPSA and NCSC accept no liability whatsoever for any expense, liability, loss, damage, claim or proceedings incurred or arising as a result of any error or omission in the document or arising from any person acting or refraining from acting, relying upon or otherwise using the guidance. This exclusion applies to all losses and damages whether arising in contract, tort, by statute or otherwise including where it is a result of negligence. NPSA and NCSC separately and expressly exclude any liability for any special, indirect and/or consequential losses, including any loss of or damage to business, market share, reputation, profits or goodwill and/or costs of dealing with regulators and fines from regulators.

Institutions and individuals have a responsibility to ensure that they comply with all relevant legal obligations, as well as any other obligations to which they are beholden. This guidance included in this document should not be considered exhaustive. This guidance raises issues for consideration but does not dictate or purport to dictate what conclusions institutions should reach.



© Crown Copyright 2024

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit [nationalarchives.gov.uk/doc/open-government-licence/version/3](https://nationalarchives.gov.uk/doc/open-government-licence/version/3)

You may use or reuse this content without prior permission but must adhere to and accept the terms of the Open Government Licence for public sector information.

You must acknowledge NPSA as the source of the content and include a link to the Open Government Licence wherever possible. Authorisation to reproduce a third party's copyright material must be obtained from the copyright holders concerned.

