Research Security – CIHR Implementation

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When will the policies take effect and which FOs will they apply to?

NSGRP
National Security Guidelines for Research Partnerships

- The screening question (Yes/No) regarding the involvement of private sector partners was included in the Fall 2023 Project Grant competition as a pilot.

- Given a CIHR-wide code freeze we cannot deploy the full functionality associated with the form in time for the Spring 2024 PJT competition.

- The screening question will once again appear in the Spring 2024 Project Grant competition with a full implementation of this policy, including the form for the Fall 2024 competition.

- For now, the policy only applies to the Project Grant competitions.

STRAC
Policy on Sensitive Technology Research and Affiliations of Concern

- The STRAC policy and its new requirements will apply to grant funding opportunities launched on or after May 1, 2024, with some exceptions.

- Exceptions, including but not limited to: Knowledge Mobilization, Café Scientifique, Planning & Dissemination, and Prizes.

- These requirements will not apply retroactively to previously awarded grants.

The policies <u>do not apply</u> to any Awards competitions (e.g., Travel, Canada Graduate Scholarships, Canada Doctoral Scholarships, Vanier Canada Graduate Scholarships, Banting Postdoctoral Fellowships and the CIHR Fellowship Program).

Implementation of the policies at CIHR - Intent

NSGRP

To request applicants (whose proposals involve one or more partners from the private sector) to submit a mandatory **Risk Assessment Form** which will provide a framework through which researchers, research institutions and Canada's federal funding organizations can undertake consistent, risk-targeted due diligence to identify and mitigate potential national security risks linked to research partnerships.

STRAC

To identify researchers on grant applications where the proposal will **advance** one or more sensitive research technology areas, and to submit a mandatory **Attestation Form**.

IMPORTANT NOTE

Policies apply for the duration of the grant. All research team members are required to comply with the policies.

Grant recipients **must** inform CIHR and their institutional officials of any changes to:
- the set of researchers with named roles in the grant;
- of any changes in the nature of the research that may requires an attestation of compliance; and
- of any new private sector partnerships.

NSGRP – How will it be implemented at CIHR?

A new mandatory question in ResearchNet, under **Enter Proposal Information - Details** will ask a Yes/No screening question:

"Does the proposal involve one or more partner organizations from the private sector?"

Enter Proposal Information

This task collects information related to your research proposal. To complete the task you must complete the sub-tasks listed on this screen.

For program specific information consult the "Eligibility" and the "How to Apply" sections of this funding opportunity.

Subtasks	Enter Proposal Information - Details
✔ Overview	Fields that appear in bold with an Asterisk * are mandatory. **It is important to save any additions or changes before navigating away from this page.**
✔ Details	
✔ Descriptors	* Does the proposal involve one or more partner organizations from the private sector? *(required)*
✔ Attachments	Yes ⌄
	—
	No /Integrated Knowledge Translation (iKT) projects
	Yes

NSGRP – Risk Assessment Form

If the answer is Yes:

➢ A mandatory [Risk Assessment Form](#) **(RAF)** will have to be completed by the NPA and uploaded for the application.

➢ Only one (1) risk assessment form per application, which must consider all the private sector partner organizations involved in the proposed research project and include a **Mitigation Plan.**

If the answer is No:

➢ No further steps are required under this policy.

➢ The task will be marked as completed.

Innovation, Science and Economic Development Canada / **Innovation, Sciences et Développement économique Canada**

Protected When Completed

National Security Guidelines for Research Partnerships
Risk Assessment Form

| Save As | Print | Reset |

| Family name of applicant: | Initial(s) of all given names of applicant: | Grant administering institution: |

Introduction

The Risk Assessment Form is a tool to identify and assess potential risks that research partnerships may pose to Canada's national security as outlined in the National Security Guidelines for Research Partnerships and to develop effective mitigation measures.

In answering the Risk Assessment Form questions, you will provide information – to the best of your ability – that is specific to your proposed area of research and prospective research partner organizations. This information will be used to assess national security risks where the proposed research partnership could expose the research project to foreign interference, espionage or theft from foreign governments, militaries and other organizations, and also pose potential risks to the wider Canadian research enterprise.

| Save As | Print | Reset |

Section 4: Risk Mitigation Plan

The purpose of this section is to present your **risk mitigation plan**. This plan will ensure that you identify the appropriate mitigation measures to reduce the likelihood of an identified security risk materializing, and/or to lessen the impact in case the identified risk materializes.

When developing your risk mitigation plan, you must address all risk factors that you identified by answering "**yes**" or "**unsure**" to questions in the Know Your Research **and** Know Your Partner Organization sections.

Your risk mitigation plan should be developed **with your institution**. You may also involve your institution's corporate support services (e.g., IT, security, legal) to confirm the viability and feasibility of the proposed measures.

Mitigation measures should be tailored to the research project and commensurate with the risks identified while considering open science principles. For instance, your risk mitigation plan could cover areas, such as, but not limited to:

- Describing any other relevant review processes for which the project has been subject to (e.g., a Research Ethics Board review focusing on how personal data gathered through the research project will be safeguarded)
- Raising research security awareness and building capacity across your research team
- Ensuring that your partner organization(s)' objectives align with the objectives of the partnership
- Ensuring sound cybersecurity and data management practices
- Agreement on the intended use of research findings

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STRAC – How will it be implemented?

A new mandatory Task in ResearchNet: **Identify Sensitive Technology Areas** will ask a Yes/No screening question:

> **"Will the proposed research activities, supported by this grant, advance any of the listed sensitive technology research areas?"**

STRAC – How will it be implemented?

If the answer is Yes:

➢ An <u>attestation form</u> from <u>all named participants</u> (one per participant) in the grant application, including the NPA, will have to be collected, attesting that none of the individuals involved in activities supported by the grant are affiliated with, or in receipt of funding or in-kind support, from a university, research institute or laboratory named on the NRO. To fulfill application requirements, the NPA must then combine all attestation forms into one (1) single PDF file and upload to ResearchNet.

STRAC – Attestation Form

If the answer is No:

➢ No further steps are required, Research that will use but **not advance** an existing technology is not within the scope of this policy.
➢ The task will be marked as completed.

For more information on the application process, e-mail stagingsupport@researchnet-recherchenet.ca.

🗔 **Tasks**		
Task	**Status**	**Task Completion Date**
⚑ Identify Participants	Incomplete	
⚑ Enter Proposal Information	Incomplete	
✔ Identify Sensitive Technology Research Areas ✔	Complete	2023-10-12 10:00:21 ✔
⚑ Complete Application	Incomplete	
⚑ Enter Budget Information	Incomplete	
⚑ Attach Other Application Materials	Incomplete	
⚑ Identify Application Partners	Incomplete	
⚑ Complete Peer Review Administration Information	Incomplete	

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Two important definitions

Who are the applicants with a "Named Role" on an application?

For the STRAC policy's Attestation form, participants with named roles on an application includes the NPA, Applicants, Co-Apps, and Knowledge Users, it does not apply to Collaborators or Students. NSERC and SSHRC have a different role for Collaborators on applications than CIHR does, which makes exempt from the "named role" category, at CIHR.

What is a Private Sector Partner?

Private sector organizations are those that are not owned or operated by the government and encompass all for-profit businesses.

Lists that will operate in conjunction with the policies

The Sensitive Technology Research Areas (STRA) list

- Composed of 11 high-level technology categories at various stages of development.

- The sub-categories indicate the specific **sensitive technology research areas** of concern.

- The specific concern is the **advancement** of a technology during the course of the research.

- Research that will use, but not advance, an existing technology is not within the scope of this policy.

- [Sensitive Technology Research Areas](#)

The Named Research Organizations (NRO) list

- Composed of **103 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.

- The STRAC policy concerns the institutions listed on the NRO list.

- Researchers are encouraged to apply due diligence practices to mitigate risks that may be associated with any collaboration or partnership in a sensitive technology research area – even if an institution is not included in the current list.

- [Named Research Organizations](#)

Both lists will be updated regularly to address evolving threats to Canada's national security.

What is the role of the Research Grant Officers (Institution)

Individuals with access to grant applications to complete eApproval processes at the Research Institution, will see the new questions, applicant responses and uploaded documents (where applicable) when they view the application PDF as part of the eApproval process.

NSGRP

- Researchers are expected to develop their mitigation plan in collaboration with their institutions.

STRAC

- The institutions have a responsibility to ensure that researchers are appropriately compliant with the policy. They should perform a completeness check to ensure that all required attestation forms have been provided with the application, if the applicant has identified that the grant will **advance** a listed sensitive technology research area, and that individuals involved in activities supported by the grant are affiliated with, or in receipt of funding or in-kind support, from an entity named on the NRO.

- Research Grant Officers are not expected to validate the accuracy of attestation forms that are submitted to the granting agencies.
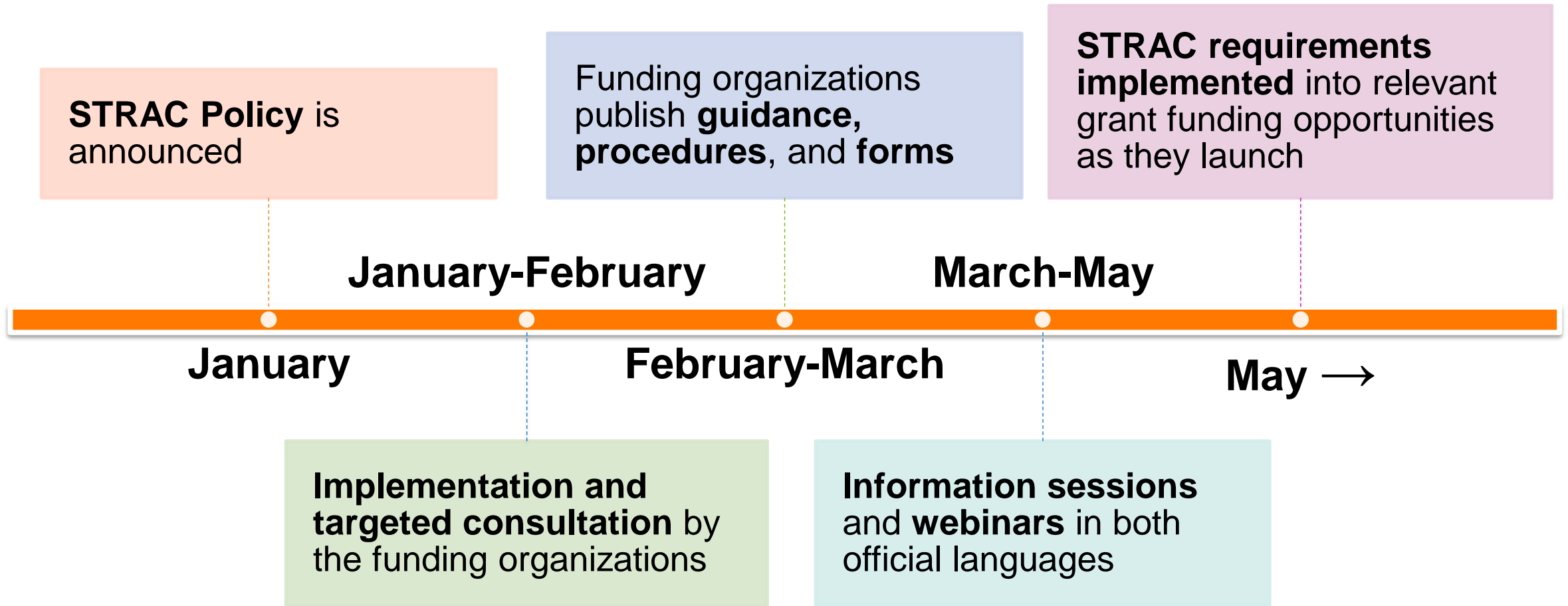
How will the policies affect peer review?

Will the RAF and Attestation forms be reviewed by the peer review committee members?

No. ResearchNet will not allow forms to be included in the peer review committee members, Chair or Scientific Officers review packages.

They are for CIHR use only.

- Reviewers will be instructed to **not** raise research security concerns as part of their review.

- They are asked to focus their assessments and deliberations on the scientific review and specific evaluation criteria provided.

- If concerns or questions related to research security are raised by committee members during the review or peer review meeting, CIHR staff will redirect the information to CIHR's Research Security team for their awareness.

Next Steps

STRAC Policy is announced

Funding organizations publish **guidance, procedures**, and **forms**

STRAC requirements implemented into relevant grant funding opportunities as they launch

January-February

March-May

January

February-March

May →

Implementation and targeted consultation by the funding organizations

Information sessions and **webinars** in both official languages

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