



Australian Government
Department of Education

Pulse Check on the implementation of the Guidelines to Counter Foreign Interference in the Australian University Sector

Department of Education



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The document must be attributed as the Pulse Check on the implementation of the Guidelines to Counter Foreign Interference in the Australian University Sector.

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Executive Summary

Introduction

Australian higher education and research is at the leading edge of policy, research and scientific development. This opens the sector to a range of national security risks, including foreign interference, in an increasingly complex operating environment. The 2024 ASIO Annual Threat Assessment has underlined that foreign interference and espionage is the principal security concern facing Australia.

Australia's countering foreign interference approach focuses on raising the awareness of, and building resilience across, the sectors of Australian society which are most at-risk from foreign interference, including the university and research sector.

The Department of Education (the department) maintains strong engagement and collaboration with the higher education and research sector to mitigate risks of foreign interference, as well as participating in the University Foreign Interference Taskforce (UFIT). The UFIT was established to bring together the university sector and Australian Government to better support and build the sector's understanding of how foreign interference threats may manifest.¹

Background

In 2023 the department released the *Report on implementation of the Guidelines to Counter Foreign Interference in the Australian University Sector* (the Report).²

The Report identified the progress of universities' uplift in establishing, reviewing or updating key initiatives or measures to address the risk of foreign interference, and new or emerging barriers to implementing the Guidelines to Counter Foreign Interference in the Australian University Sector (the Guidelines).

Building on findings of the Report, in 2024 the department invited all 42 Australian universities to participate in its Annual Pulse Survey (the Annual Survey) of self-reported implementation of the Guidelines over the past 12 months, and a Countering Foreign Interference Workshop Series (Workshop Series) across Australia, designed to enhance universities' understanding of the risk environment.

¹ [Countering foreign interference in education and research \(homeaffairs.gov.au\); University Foreign Interference Taskforce - Department of Education, Australian Government](https://www.homeaffairs.gov.au/university-foreign-interference-taskforce)

² <https://www.education.gov.au/guidelines-counter-foreign-interference-australian-university-sector/resources/report-implementation-guidelines-counter-foreign-interference-australian-university-sector>

Key Findings from the Annual Survey and Workshop Series

Universities continue to actively engage with the Guidelines and are taking steps to build countering foreign interference capability. The sector acknowledges that Guidelines implementation is not a point-in-time endeavour, and universities are continuing to strengthen and refine countering foreign interference measures to adapt to the current risk environment.

While the majority of universities have strengthened and refined countering foreign interference measures in the past twelve months, nearly half have reported continuing to face new or emerging barriers to implementing the Guidelines.

1. In the past 12 months, 92% of universities have established or refined key initiatives which strengthen their resilience to foreign interference risks.
2. 52% of universities stated cyber security is the pillar of the Guidelines which they had invested the most resources over the past 12 months.
3. Universities welcomed further collaboration with other universities and government to share best-practice, with 97% expressing interest in a department-led Communities of Practice Forum.
4. Universities commonly requested further due diligence and risk assessment guidance, with 26% reporting this to be the most beneficial form of government advice in implementation of the Guidelines.
5. 49% of universities reported experiencing new or emerging barriers to implementing the Guidelines, typically related to resource considerations.

Consultation

Annual Pulse Survey

In April and May 2024, the department conducted the *Annual Pulse Survey on implementation of the Guidelines to Counter Foreign Interference in the Australian University Sector*, which assessed the progress of implementation of the Guidelines from April 2023 – April 2024.³

The Annual Survey contained five questions seeking feedback from universities on implementation of the Guidelines: key measures and initiatives to address the risk of foreign interference; new or emerging barriers to implementation; most significant pillar of the Guidelines in terms of investment; and avenues for further government support, including communities of practice. The department received completed surveys from 39 universities (93% response rate).

Countering Foreign Interference Workshop Series

In June 2024, the department led a series of workshops around Australia (Brisbane, Melbourne, Perth, Sydney, and virtual) with the university sector, focused on enhancing universities' understanding of the foreign interference risk environment.

The Workshop Series was delivered in collaboration with the National Office of Cyber Security (NOCS) and the Countering Foreign Interference Coordination Centre (CFICC) within the Department of Home Affairs, and the Australian Cyber Security Centre (ACSC).

Universities were encouraged to share their own perspectives and approaches to foreign interference risk management to inform case studies developed by the department, and provide feedback relating to their experiences navigating the national security ecosystem.

The Workshop Series was attended by 113 representatives of the university sector, representing 36 of the 42 invited universities (86% engagement rate).

³ Survey responses were self-reported by universities and many of the below outcomes are based on responses provided in free text boxes. In many cases universities reported multiple initiatives and/or measures, and therefore the data provided should not be considered quantitative or final.

Consultation Findings

Across the breadth of universities, there remains a strong understanding of the threats posed by foreign interference, and active engagement with the Guidelines. Universities continue to strengthen foreign interference risk mitigations, although implementation continues to vary depending on scale and maturity within universities, as per the design of the Guidelines.

Universities acknowledge countering foreign interference is an ongoing process, and implementation of the Guidelines requires adaptability in approach. As the threat environment evolves, universities understand foreign interference initiatives and measures will need to be reviewed, updated, or developed accordingly.

This section will expand on the key findings from the consultation, analysing:

- Recent initiatives or measures by universities to address foreign interference.
- Areas in which universities have invested the most resources in implementing the Guidelines.
- Opportunities for further government-sector collaboration, including communities of practice.
- Areas where universities have requested further guidance from government.
- New or emerging barriers to universities' implementation of the Guidelines.

The Annual Survey and Workshop Series demonstrated the value of engagement between the sector and government in building foreign interference resilience, and the benefits of continued collaboration.

Recent initiatives or measures to address foreign interference

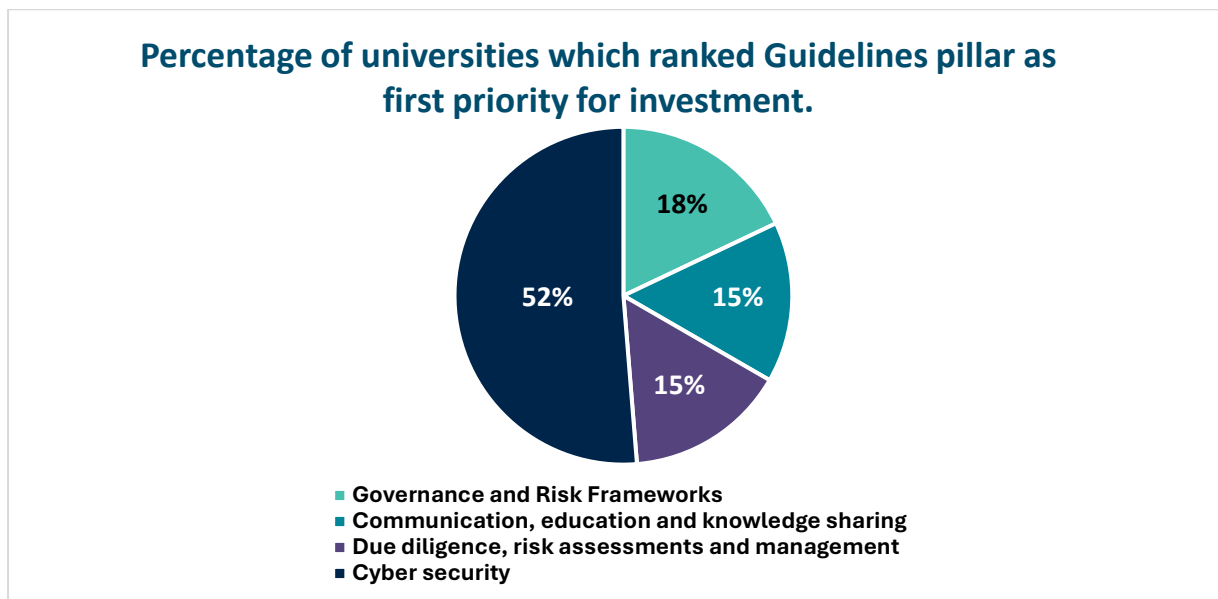
36 (92%) universities reported establishing, reviewing or updating key initiatives or measures to address the risk of foreign interference in the past twelve months.



- 26 (67%) universities reported updating or reviewing existing countering foreign interference initiatives and measures.
- 20 (51%) universities reported developing or establishing countering foreign interference policies or frameworks, including due diligence and risk assessment procedures.
- 17 (44%) universities reported developing or establishing staff and student communication campaigns, including online training and education on foreign interference risk.
- 9 (23%) universities reported developing or establishing countering foreign interference committees, working groups or risk management teams.

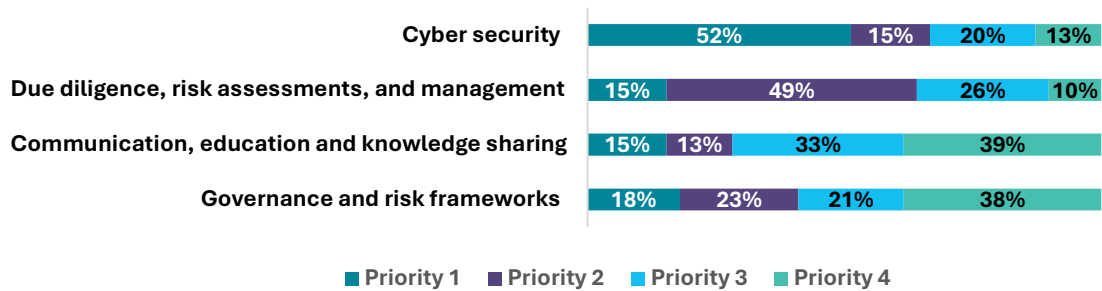
Cyber security resource priority

20 (52%) universities stated cyber security was the area in which they had invested the most resources in the past 12 months. This finding is consistent with university responses during the 2023 consultation, and indicates cyber security continues to be a priority for the sector in 2024.



A significant number of universities reported investing resources into due diligence, risk assessments and management, with 19 (49%) universities reporting this pillar of the Guidelines as their second highest priority for investment of resources, reflecting an increased focus and understanding of research security risks within the sector.

Percentage of universities which ranked each Guidelines pillar by priority for investment.



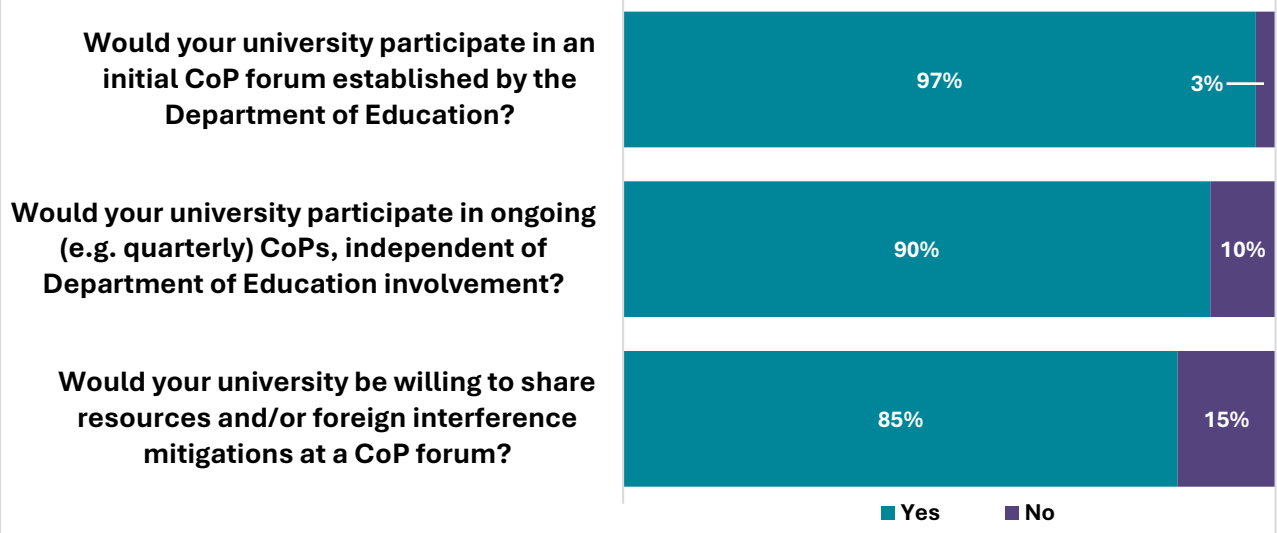
Universities also reported investing time, energy and resources into implementing governance and risk frameworks, and in communication, education and knowledge sharing.

Collaboration with government

Respondents were strongly interested in collaborating with other universities and government to share best-practice approaches through a Communities of Practice (CoP) Forum.

38 (97%) universities expressed interest in a department-led CoP Forum, and 33 (85%) indicated they would be willing to share resources and foreign interference mitigation measures at a CoP forum.

University interest in a CoP Forum



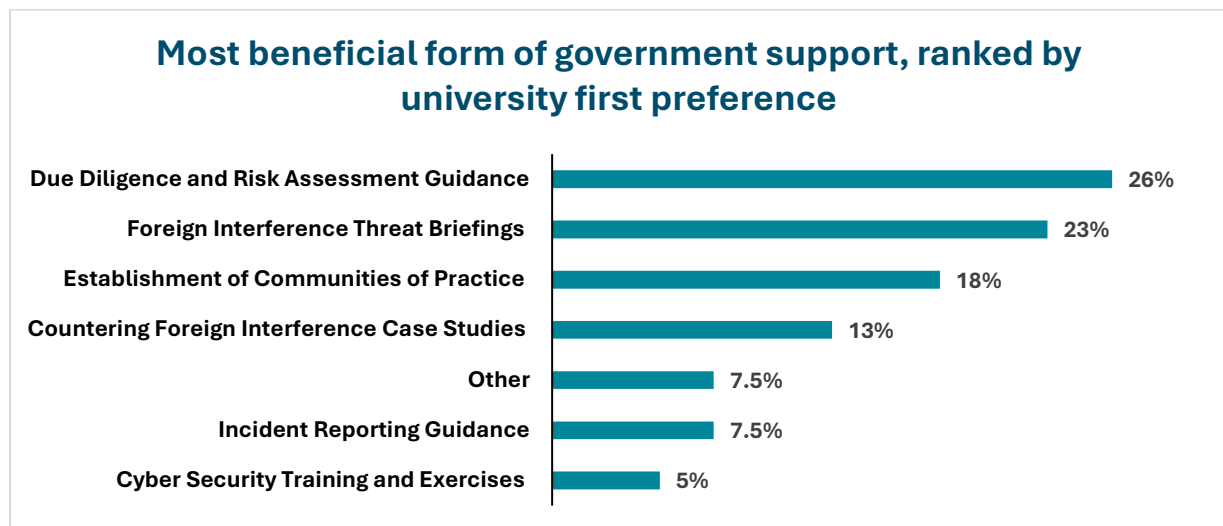
Universities agreed the UFIT remains a successful model for government-sector collaboration on countering foreign interference and support its continuation.

Workshop discussions did, however, indicate universities would benefit from greater dissemination of information to practitioner-level staff to support the continued work of the UFIT.

Further government guidance

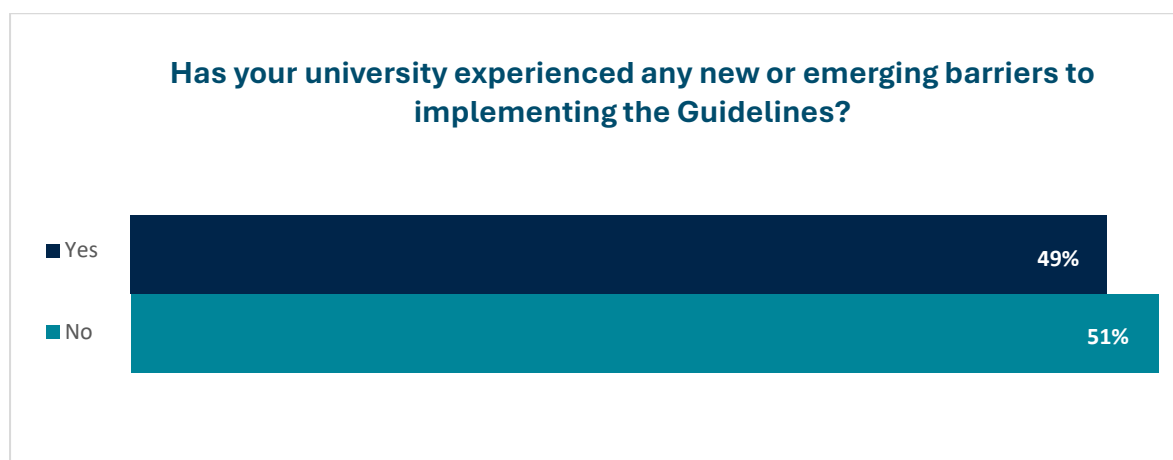
Reflecting feedback relating to new or emerging barriers, universities reported that further government guidance regarding due diligence and risk assessments would be the most beneficial measure to enhance countering foreign interference capability in the sector.

Consistent with reporting during the 2023 consultation, universities noted the benefit of further foreign interference threat briefings to ensure they are appropriately informed of the evolving risk.



New or emerging barriers to implementing the Guidelines

19 (49%) universities reported experiencing new or emerging barriers to implementation the Guidelines.



- 11 (28%) universities reported difficulties undertaking due diligence, including access to information and expertise, burdens on time and resources, and navigating partner institutions' policies.
- 10 (26%) universities reported expanded compliance burdens due to evolving regulations and reporting requirements.
- 10 (26%) universities reported a need for more resources, such as training, briefings and case studies, to guide operational implementation of the Guidelines.

Universities also reported concerns about effectively communicating foreign interference considerations to staff, students and partners, including sensitively communicating risks to international student cohorts.

Next Steps

In response to the consultation findings, the department has delivered the following products to assist universities to uplift countering foreign interference capability.

- Refreshed and updated the Australian National Security Architecture Placemat to reflect the current national security ecosystem, as well as the evolving foreign interference threat context.
- Tailored countering foreign interference case studies to the sector providing practical guidance to universities on staff and student communications, and due diligence and risk assessment guidance, specific to the risks associated with dual-use technology and research.

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Government will also:

- Continue sector engagement on the foreign interference threat environment and universities' implementation of the Guidelines, including delivery of the Annual Pulse Survey and Workshop Series in 2025.
 - Continue engagement and provide tailored guidance materials on due diligence and risk assessments to support sector capability.
 - Continue inter-agency engagement and collaboration to ensure a coordinated, whole-of-government approach to sector outreach and consultation on countering foreign interference.
- Support the sector in facilitating countering foreign interference communities of practice, allowing for an uplift in capability and Guidelines implementation.
- Enhance information sharing with the sector in respect to discussions at UFIT, strengthening countering foreign interference capability within universities at the practitioner-level.

Annexure A

Achievements 2023-24

Following the 2023 consultation, the department supported the sector to implement the Guidelines and fulfil opportunities identified within the previous Report. This has led to the following achievements.

| Pillars | Achievements |
|--|--|
| Threat context | <ul style="list-style-type: none"> Continued engagement with the UFIT and other national security stakeholders. Participation in a cyber incident response desktop exercise with a university and other government agencies. |
| Governance and risk frameworks | <ul style="list-style-type: none"> Production of the Foreign Interference Impacts on Campus Culture Guidance Note. Production of the Australian National Security Architecture Placemat. |
| Communication, education and knowledge sharing | <ul style="list-style-type: none"> Completion of the 2024 Annual Pulse Survey. Delivery of the Countering Foreign Interference Workshops in June 2024. |
| Due diligence, risk assessments and management | <ul style="list-style-type: none"> Collaboration with the Department of Home Affairs (Home Affairs) on <i>the 2023-2030 Australian Cyber Security Strategy</i> and continues to support Home Affairs to implement items under <i>the Cyber Security Strategy Action Plan</i>. |
| National security ecosystem | <ul style="list-style-type: none"> Enhancing the department’s internal guidance for officials undertaking due diligence for grant assessments, elevating the profile of foreign interference considerations across the department’s work. |
| Cyber security | |