

# Compliance and International Engagements Policy (DLI)

## Section 1 - Preamble

- (1) This Policy is effective from 13<sup>th</sup> of March 2026.
- (2) This Policy is made with respect to the following legislation, regulatory requirements and guidance, referred to in this Policy as “DLI’s international regulatory regime”:
  - a. Indonesian laws and regulatory requirements applicable to DLI’s operations;
  - b. Australian laws and requirements (followed to the greatest extent possible where DLI activities are undertaken for, with, or on behalf of Deakin University, or where there is an Australian nexus); and
  - c. United Kingdom laws and requirements (followed as best as possible where DLI activities are undertaken for, with, or on behalf of Lancaster University and have a UK nexus).

## Section 2 - Purpose

- (3) This Policy sets out DLI’s commitment to meeting its obligations under DLI’s international regulatory regime described in clause (2). Indonesian legal and regulatory requirements are mandatory for DLI’s operations. Requirements arising under Deakin and Lancaster policies and applicable Australian and/or UK laws will also be applied to the extent they are relevant and can be effectively implemented within the Indonesian operating environment.
- (4) Where multiple jurisdictions apply to a DLI activity, DLI will apply the highest compatible standard that affords the greatest protection to staff, students and institutional integrity.

## Section 3 - Scope

- (5) This Policy applies to all DLI staff and where relevant, associates.
- (6) During the establishment of DLI, all policy, procedures and supporting processes will be regularly reviewed. In the establishment phase, defined as the first two years from when students commence DLI programs, any issues arising from the implementation of current policy, procedure or process will be referred to a jointly-convened Policy and Procedure Review Panel (PPRP). The PPRP will comprise designated academic and professional service representatives from the University Partners and the Office of the Rector. The PPRP will recommend an outcome best aligned with relevant principles and the best interests of any student(s) concerned, and will advise DLI on the future development of policy, procedure and supporting processes. During the establishment phase, the PPRP may make recommendations to vary any given policy only with endorsement from relevant University Partner governance processes. All policy and procedure will be subject to a full review at the end of the two-year establishment phase.

## Section 4 - Policy

- (7) DLI and individuals working with DLI have legal obligations to comply with Indonesian law and regulatory requirements. Where DLI activities are undertaken for, with, or on behalf of Deakin

University or Lancaster University, DLI will support compliance with relevant Australian and/or UK obligations to the greatest extent possible, including by applying additional policies or controls required by those universities' processes.

- (8) DLI recognises that foreign interference, Foreign Influence and cyber intrusion are risks to public interest and national security, and may expose Deakin University and/or Lancaster University to risk where DLI activities relate to those universities' programs, systems, funding, research, approvals or contracts.
- (9) DLI will take a proactive approach to identifying and addressing these risks to safeguard operations and reputation, support academic freedom, maintain stakeholder confidence, and enable DLI to fully leverage its education and research activities.
- (10) Where multiple regulatory or institutional requirements apply to a DLI activity, DLI will apply the highest compatible standard that affords the greatest protection to staff, students and institutional integrity.
- (11) Where a potential conflict or incompatibility arises between Indonesian requirements and Deakin University and/or Lancaster University requirements, DLI staff must escalate the matter in accordance with Clause (24) to determine a legally compliant pathway, including whether the activity must be modified, discontinued, or not proceed. (see also Section 6 for foreign engagement-specific escalation).

## **Section 5 - Policy & The Regulatory Framework**

### **(12) Indonesia**

- a. DLI will comply with Indonesian laws and regulatory approvals applicable to its operations and Partnerships, including requirements governing foreign higher education operations and collaboration relevant to DLI's approvals and operating model.
- b. DLI will comply with Indonesia's Personal Data Protection Law (Law No.27 of 2022) when collecting, using, storing, disclosing or otherwise processing personal data, including by implementing security measures, managing personal data protection failures, and providing notifications where required.

### **(13) Australia & United Kingdom**

- a. DLI will comply with Australian and/or UK laws to the extent they are relevant and apply to DLI's operations.
- b. Where a DLI activity is undertaken for, with, or on behalf of Deakin University and/or Lancaster University, DLI will support compliance with the requirements and controls set out in:
  - i. Deakin University's International Relations Regulation policy (and related procedures/tools); and
  - ii. Lancaster University's equivalent policies, procedures and guidance governing international engagement risk, Foreign Influence/foreign interference and research security (including any required registration, reporting or due diligence steps).
- c. For the purposes of clause (13b), "support compliance" means DLI will apply the relevant partner-university requirements to the greatest extent possible and in a manner proportionate to risk, including by completing required screening, escalating early, and obtaining approvals before commitment.

- d. Without limiting clauses (13a)–(13b), Deakin-connected activities with an Australian nexus may require additional controls and escalation in relation to:
    - i. identification and reporting of relevant foreign arrangements before entering the arrangement;
    - ii. foreign interference risk management controls consistent with the UFIT Guidelines (governance, awareness, due diligence and cybersecurity);
    - iii. Foreign Influence transparency considerations for activities connected to Australian government or political engagement;
    - iv. sanctions screening and restrictions, including restrictions on receiving funds from, or providing training or assistance to, sanctioned persons or entities;
    - v. export controls and defence trade controls, including restrictions on the transfer of controlled technology, training or Defence and Strategic Goods List related activities; and
    - vi. cybersecurity and incident escalation requirements for systems or assets subject to Deakin governance and reporting obligations, including security of critical infrastructure.
  - e. Without limiting clauses (13a)–(13b), Lancaster-connected activities with a UK nexus may require additional controls and escalation in relation to:
    - i. Foreign Influence transparency expectations and any registration requirements where activities are carried out under “direction” (or otherwise meet relevant thresholds) under the UK scheme; and
    - ii. Lancaster due diligence, research security and risk management requirements for international partnerships and collaborations.
- (14) Where there is uncertainty about whether Deakin University and/or Lancaster University obligations are triggered (including registration or disclosure requirements), the activity must be escalated in accordance with Clause (23) before DLI commits to or proceeds with the activity.

## Section 6 - Foreign Interference and Engagement Obligations

### Responsibilities of DLI Members and Associates

- (15) The **DLI Foreign Interference Checklist** is provided to assist navigation of compliance obligations in relation to foreign interference and to identify when escalation is required, including escalation to Deakin University and/or Lancaster University where their obligations may be triggered.

### Specific duties – International Partnerships

- (16) Engagement with an International Partner on behalf of DLI (including grant applications, proposed collaborators, academic partners, student placement hosts, donations/scholarships, procurement or commercial activity) requires due diligence and consideration of foreign interference and related risks.
- (17) The purpose of due diligence is (in part) to assess whether engagement with the International Partner may introduce an **Unacceptable Risk of Foreign Interference** and/or trigger obligations for Deakin University and/or Lancaster University as described in Section 5.
- (18) The first due diligence step is to complete the **DLI Foreign Interference Checklist**. If concerns are identified, staff must escalate to their line manager (or appropriate senior staff member) and the relevant DLI Responsible Officer before proceeding.
- (19) Where a proposed activity is undertaken for, with, or on behalf of Deakin University and/or Lancaster University, staff must also follow any additional screening, reporting, approval or escalation steps required by Deakin University or Lancaster University as described in Section 5, including ensuring those steps occur before DLI signs, commits, shares Sensitive Information, grants access, accepts funds, or proceeds with the activity.
- (20) Where a contract with an International Partner is anticipated, the completed **DLI Foreign Interference Checklist** must:
- be reviewed by the authorised signatory/contract sponsor prior to signing the contract on behalf of DLI; and
  - be reported to the DLI Rector and, where partner-university obligations may be triggered, escalated to the nominated Deakin and/or Lancaster contact prior to signing.
- (21) Similarly, the approver of any activity involving an International Partner that does not require a contract must also review the completed **DLI Foreign Interference Checklist** and ensure any required steps or escalations under Section 5 and this Section have been completed before the activity proceeds.

### Specific duties – Individuals

- (22) Staff or associates who engage or propose to engage with a Foreign Entity or Foreign National on behalf of DLI must:
- consider whether they have an interest to declare under the DLI Declaration of Interest process;
  - seek advice from DLI People function to confirm appropriate pre-employment checks are undertaken (proportionate to role risk);
  - complete the **DLI Foreign Interference Checklist**; and
  - where Deakin University and/or Lancaster University involvement is present, ensure all processes required under Section 5 and this Section 6 are completed before proceeding.

## Section 7 - Staff Escalation Requirements

- (23) If staff are uncertain whether an activity triggers obligations described in Section 5 or Section 6 (including disclosure, registration, sanctions or export control considerations), they must seek guidance and escalate to the following before proceeding:
- a. the DLI Responsible Officer and DLI legal/compliance function;
  - b. the nominated Deakin University legal/compliance contact where Deakin obligations may be triggered; and/or
  - c. the nominated Lancaster University contact where Lancaster obligations may be triggered.
- (24) Where an apparent conflict arises between Indonesian requirements and Deakin University and/or Lancaster University requirements, staff must escalate to the DLI Rector and DLI Legal Advisors, who will consult the nominated Deakin and/or Lancaster legal/compliance contact to determine an agreed compliant pathway (including whether the activity must be modified or not proceed).
- (25) The Responsible Officers for DLI are:
- a. DLI Rector or nominee
  - b. DLI Chief Operating Officer or nominee

## Section 8 - Definitions

- (26) For the purpose of this Policy:
- a. **Associates:** Individuals who work with or support DLI in a non-employee capacity, including contractors, consultants, volunteers, visiting lecturers, visiting researchers, and other authorised visitors (*tamu resmi universitas*).
  - b) **Foreign Entity:** Any government, organisation, institution, university, corporation, foundation, or legal body that is considered foreign under the legal or institutional requirements applicable to the DLI activity. This includes entities established outside the Republic of Indonesia when Indonesian requirements apply, and entities located outside Australia and/or the UK when Deakin University and/or Lancaster University requirements may apply, including any such entity that is directly controlled, funded, or significantly influenced by a foreign government or state-linked organisation.
  - c) **Foreign Influence:** Activities undertaken by foreign individuals, organisations, or entities that seek to shape, direct, or affect decision-making, research priorities, governance processes, public communications, or operations. Such influence may occur through lobbying, advocacy, funding, partnerships, public messaging, or attempts to leverage personal relationships or prior positions.
  - d) **Foreign Nationals:** Individuals who are not citizens or permanent residents of Indonesia (*Warga Negara Asing – WNA*), and individuals who are not citizens or permanent residents of Australia and/or the United Kingdom when Deakin University and/or Lancaster University requirements may apply.
  - e) **International Partner:** Any individual, organisation, institution, or entity located outside Indonesia, or located outside Australia and/or the United Kingdom when Deakin University and/or Lancaster University requirements may be triggered, that engages in collaboration,

partnership, or joint activity with DLI, including academic, research, commercial, or cultural cooperation.

- f) **Partnership:** Any formal or informal arrangement, agreement, collaboration, or commitment between DLI and an external party—domestic or international—regardless of whether it is legally binding. This includes academic partnerships, research collaborations, mobility programmes, and capacity-building initiatives.
- g) **Sensitive Information:** Any official, confidential, personal, or proprietary information created, held, or managed by DLI that requires protection from unauthorised access, disclosure, misuse, or loss. This includes information protected under Indonesian regulations such as the Personal Data Protection Law (*UU 27/2022*), cybersecurity guidelines issued by BSSN, and internal DLI confidentiality policies.
- h) **Unacceptable Risk of Foreign Interference:** A level of risk in which an activity, relationship, or partnership could compromise DLI’s integrity, independence, reputation, operations, or Indonesia’s, UK’s or Australia’s national interests. This risk may arise from the nature of the activity (e.g., sensitive or security-related research) or from the identity, affiliations, or behaviour of an International Partner.

**ASSOCIATED DOCUMENTS**

(27) These associated documents are available on the DLI Policy page:

- Academic Partnerships (DLI) Policy
- DLI Foreign Interference Checklist

<b>POLICY DETAIL</b>	
<b>Name of policy</b>	Compliance and International Engagements Policy
<b>Approved by</b>	Yayasan Governing Board
<b>Approval date</b>	27 <sup>th</sup> of February 2026
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<b>Date of review</b>	Within 12 months
<b>DLI Approval</b>	<i>Joint Management Committee</i> 26 <sup>th</sup> of February 2026
<b>Responsible Executive</b>	DLI Rector
<b>Implementation Officer</b>	DLI Chief Operating Officer
<b>Policy/procedure superseded</b>	Not applicable
<b>Associated documents</b>	Not applicable
<b>Summary</b>	This Policy sets out DLI’s commitment to meeting its obligations under DLI’s international regulatory regime described in clause (2). Indonesian legal and regulatory requirements are mandatory for DLI’s operations. Requirements arising under Deakin and Lancaster policies

	and applicable Australian and/or UK laws will also be applied to the extent they are relevant and can be effectively implemented within the Indonesian operating environment.
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