UCL Third-party organisation due diligence questionnaire



**RESEARCH AND INNOVATION SERVICES**

# Introduction

Due diligence (DD) is the investigation, or exercise of care, that a reasonable business or person is expected to take before entering into an agreement or contract with another party. It supports good decision making and mutual understanding of costs, benefits, and risks. Many of UCL’s main funders require lead institutions to carry out appropriate DD checks on third parties who undertake activities funded by a research grant or contract.

This form is adapted from the UK Research and Innovation (UKRI) DD questionnaire and consistent with those used by other UK universities.

Further information on UCL’s DD policy and process, along with further guidance, is available on the [Research and Innovation Services (RIS) website](https://www.ucl.ac.uk/research-innovation-services/compliance-and-assurance/due-diligence). The UCL policy has been expanded in this instance to include all partner organisations who will receive funds under VaxHub platform funding activity but the process remains the same.

# What is this questionnaire for?

This questionnaire forms part of the second stage DD process, for partners where the financial transfer is over £30,000. It is designed to enable Principal Investigators (PIs) to capture from their partners the relevant information required as part of UCL’s DD policy and process.

# When to use this questionnaire

PIs should ensure that all potential partner organisations are aware of the need to complete this questionnaire at the earliest possible opportunity, as required. [UCL’s DD guidance and policy](https://www.ucl.ac.uk/research-innovation-services/compliance-and-assurance/due-diligence) should be read in full. A brief summary of the process for DD is as follows:

All project partners receiving funds under VaxHub platform funding activities should be asked to complete UCL’s DD questionnaire, unless they have previously done so within the last 36 months and the relevant information remains unchanged before any contracts are created, research begins and/or funding is transferred. PIs should work with the partner organisation(s) to complete the relevant sections of the questionnaire with all necessary information and obtain relevant supporting documentation.

Please note Third-party due diligence checks will not apply to any of the following:

* When the third party is an individual
* When the third party is on the [Higher Education Statistics Agency (HESA) list](http://www.hesa.ac.uk/support/providers) of UK higher education providers
* When the third party is a [UK Government department, agency, or public body](https://www.gov.uk/government/organisations), or local authority in [England and Wales](https://www.local.gov.uk/our-support/guidance-and-resources/communications-support/digital-councils/social-media/go-further/a-z-councils-online), and [Scotland](https://www.mygov.scot/organisations#scottish-local-authority).

# How to use this questionnaire

The first two sections of this questionnaire should be completed by the PI, with subsequent sections completed by the third-party organisation.

PIs should ensure that all potential partner organisations complete, in English, the organisation details below, the relevant sections in accordance with the determination of risk, as well as the document checklist at the bottom of the form. All attachments should also be provided in English. Applicants should also prove they have approval through the appropriate authorising signature. Where it is not possible to complete the questionnaire or supply relevant supporting documentation, a brief explanation should be provided and discussed with the PI and the RIS Compliance and Assurance team.

# Previous partners

Organisations which have previously been approved as UCL partners and have provided the relevant information in the past 36 months (and it has not changed since then) do not need to complete this questionnaire in full. This information is captured in the organisational profile on Worktribe.

# Risk assessment and approval

UCL will save questionnaire responses and supporting documentation for a period of 36 months after which they will need to be updated. UCL will store the responses to this questionnaire and any associated documentation until seven years after the end of the research project, in line with the requirements of most research funders.

Information provided in this questionnaire and any associated documentation will be used to inform a risk assessment and recommendation for approval or otherwise of the partnership.

# Queries and Questions

If you have any questions, including whether you need to complete this form or to check if UCL has undertaken a Due Diligence assessment in the last 36 months, please contact vaxhub@ucl.ac.uk.

# Section 1: Partner organisation details (to be completed by the organisation’s lead contact)

|  |  |
| --- | --- |
| Name of partner organisation |  |
| Postal address |  |
| Name and Email of lead contact |  |

# Section 2: Legal status and corporate governance (to be completed by the organisation’s lead contact)

This section confirms the legal status of the organisation and refers to governance structures, policies, and procedures, including insurance.

|  |  |  |
| --- | --- | --- |
| 3.1 | What is the legal status of the organisation? How is it registered and with which official body?Please provide:* An English version of registration documents for the organisation or other legal documents agreeing to its formation.
* Any Memorandum or Articles of Association or other written rules about running the organisation agreed by the representatives of the organisation.
 |  |
| 3.2 | Please provide:* Information on the governance structure of the organisation.
* Documentation which confirms which representatives of the organisation have the authority to approve contracts.
 |  |

## Policies and procedures

For questions 3.3 through 3.13, please confirm what policies and procedures are in place that cover each matter, and provide copies of the documents in English, or links to a website where the information is hosted, along with a copy of a date-stamped archive page or screenshot (if the website is not in English, please provide an abstract highlighting key areas in English). Where policies and procedures are not in place, please provide a short explanation. Please provide copies of relevant polices where possible.

|  |  |  |
| --- | --- | --- |
| 3.3 | Risk management policy/strategy |  |
| 3.4 | Detecting, reporting, and acting upon misconduct, including research misconduct, and bullying and harassment |  |
| 3.5 | Anti-fraud, corruption, and bribery |  |
| 3.6 | Whistleblowing  |  |
| 3.7 | Equality and diversity |  |
| 3.8 | Data management and protection  |  |
| 3.9 | Travel and subsistence  |  |
| 3.10 | Conflict of Interest |  |

## Safeguarding and ethics

Please provide copies of relevant polices where possible.

|  |  |  |
| --- | --- | --- |
| 3.11 | Does the organisation have a formal child and vulnerable adults safeguarding policy? |  |
| 3.12 | Does your organisation (and all subcontractors) have documented labour standards, and operate in line with the UK Modern Slavery Act 2015? In particular how does your organisation ensure that your employees and those in your supply chains are not subject to exploitation through:* Slavery, servitude, and forced or compulsory labour
* Sexual exploitation
* Organ donorship
* Force, threats, or deception
* By virtue of them being a child or other vulnerable person
 |  |
| 3.13 | Describe how ethical standards of research are maintained within the organisation, ensuring appropriate ethical review of research grants. |  |

## Particular instances of risk

|  |  |  |
| --- | --- | --- |
| 3.14 | Has there been any reported cases of fraud in the past five years? If so, how was it managed and how was the incident resolved? |  |
| 3.15 | Are there any current, pending or threatened arbitration proceedings (whether as a claimant or defendant), or any prosecution or inquiry pending by a government or official body |  |
| 3.16 | Under UK legislation, primarily the Terrorism Act 2000, sections 15-18 on funding terrorism, it is an offence to provide funding or property where there is reasonable cause to suspect it will or may be used for the purposes of terrorism. Under section 19 it is an offence to fail to disclose information about acts of terrorism, including the funding of terrorism.Please indicate your agreement to adhere to this statement.  |  |

# Section 4: Ability to deliver - finance (to be completed by the organisation’s lead contact)

We are required to understand the organisation’s financial position. This section refers to financial stability.

## Financial management

|  |  |  |
| --- | --- | --- |
| 4.1 | Are you able to provide copies of audited financial reports for the last three financial years? Please provide electronic copies or a link to the web page where they are published. If no, or your organisation has been established for less than three years, can you provide your most recent finalised financial reports? |  |
| 4.2 | Does the organisation have a bank account held in the organisation’s name, which can receive grant funds in GBP? If no, which currency/currencies are you able to transact in?  |  |
| 4.3 | Does your organisation need prior authorisation from another body or government in order to accept and/or disburse funds relating to research, innovation or teaching projects? If yes, please give details of the circumstances in which this is applicable, the process and timeline for authorisation. |  |
| 4.4 | How does your organisation manage foreign currency exchange risks where the income is in a different currency than the expenditure?  |  |

## Audit

|  |  |  |
| --- | --- | --- |
| 4.5 | Has your organisation been subjected to any internal/external audits on post award financial research management within the last three years? If not, when was the last time an internal or external audit was carried out, and by who? |  |

## Insurance

|  |  |  |
| --- | --- | --- |
| 4.6 | Please confirm if you have public liability insurance and to what value/limit. |  |
| 4.7 | Please confirm if you have professional indemnity insurance and to what value/limit. |  |

# Section 5: Ability to deliver - grant administration (to be completed by the organisation’s lead contact)

This section refers to research grant management and financial monitoring.

|  |  |  |
| --- | --- | --- |
| 5.1 | Please provide a brief outline of the three biggest externally funded research, innovation and/or teaching projects (by financial value to your organisation) that your organisation is currently or was recently (in the last three years) working on. |  |
| 5.2 | Does your organisation have a team(s) that provide administrative support service to research projects? What services do they provide? E.g., finance monitoring, contract management etc. |  |
| 5.3 | Who has overall responsibility for the management of externally funded projects across the organisation? This could be an individual or a designated group such as a research office. |  |
| 5.4 | How is expenditure on externally funded projects monitored? This includes expenditure relating to staff, travel, equipment and materials purchasing, and invoices.How do you monitor finances for individual projects separately from the rest of the organisation? E.g., will this be a specific project number/ separate bank account? |  |
| 5.5 | You will be required to adhere to funder reporting requirements for individual projects. This may include providing quarterly detailed transaction listings for all expenditure incurred using grant funds, scanned receipts for transactions, and evidence of staff hours worked on the project. Are you able to comply with these reporting requirements if necessary? |  |
| 5.6 | How does your organisation record and evidence the number of hours worked by staff on externally funded projects e.g., timesheets?  |  |

# Section 6: Sub-contract management (to be completed by the organisation’s lead contact)

This section refers to funds you are paying to other organisations or people to do work on your behalf.

|  |  |  |
| --- | --- | --- |
| 6.1 | Do you have a policy in place to sufficiently manage sub-contractors, including provisions for ensuring their compliance with funder requirements and terms and conditions?Please provide a copy or link where this is located. If you do not have a policy, please give details of how sub-contracts are managed and any other relevant evidence of your ability to manage sub-contracted grants. |  |
| 6.2 | Do you undertake due diligence on your sub-contractors to assess their ability and suitability to undertake the work required? |  |
| 6.3 | How will your relationship with any sub-contracting organisations be governed? For instance, do you have in place a contract or memorandum of understanding?Please provide a copy of a recent sub-contract agreement in English, or explicitly state if there are none currently. |  |
| 6.4 | Are you able to pay sub-contractors who are based outside of your own country?  |  |

# Enclosed document checklist

A summary of the information you need to provide or reference as part of this application. Please note: This can be in the form of a copy or a link to where the document is held and mustbe in English.

|  |  |  |
| --- | --- | --- |
| Corresponding question | Document | Enclosed(Yes/No) |
| 3.1 | Evidence of legal status |  |
| 3.1 | Memorandum or Articles of Association or similar |  |
| 3.3 | Risk management policy / strategy |  |
| 3.5 | Anti-fraud, corruption and bribery policy |  |
| 3.6 | Whistleblowing policy |  |
| 3.7 | Equality and diversity policy |  |
| 3.8 | Data management policy / data protection policy |  |
| 3.9 | Travel and subsistence policy |  |
| 3.10 | Conflict of interest policy |  |
| 3.11 | Child and adult safeguarding policy |  |
| 3.13 | Research integrity and ethics policy |  |
| 3.14 | Policies and procedures for detecting, reporting and acting upon financial fraud |  |
| 4.1 | Latest management accounts or internal financial reporting |  |
| 6.2 | Sub-contract management policy |  |
| 6.4 | Recent sub-contract agreement |  |

# Declaration

All research grants are subject to the Funder Terms and Conditions. If for any reason you cannot adhere to any of the conditions, please state which ones and the reason why below. The information provided in this questionnaire should be a true representation of your organisation. If false information has been provided there is a chance this will affect your funding going forward.

To confirm the above please sign below.

Signed …………………………………………………………………..

Date …………………………………………………………………..

Position …………………………………………………………………..