UCL Third-party organisation due diligence questionnaire – under £30k



**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 under £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

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 of UK higher education providers](http://www.hesa.ac.uk/support/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 3: 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. |  |

## Safeguarding and ethics

Please provide copies of relevant polices where possible.

|  |  |  |
| --- | --- | --- |
| 3.2 | Does the organisation have a formal child and vulnerable adults safeguarding policy? |  |
| 3.3 | 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
 |  |
| 3.4 | Describe how ethical standards of research are maintained within the organisation, ensuring appropriate ethical review of research grants.Research integrity and ethics policy. |  |

## Particular instances of risk

|  |  |  |
| --- | --- | --- |
| 3.5 | 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?Policies and procedures for detecting, reporting and acting upon financial fraud. |  |
| 3.6 | 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? |  |

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

This section refers to research grant management and financial monitoring.

|  |  |  |
| --- | --- | --- |
| 4.1 | 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? |  |
| 4.2 | 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? |  |
| 4.3 | How does your organisation record and evidence the number of hours worked by staff on externally funded projects e.g. timesheets? |  |

# Section 5: 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.

|  |  |  |
| --- | --- | --- |
| 5.1 | 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. |  |
| 5.2 | Do you undertake due diligence on your sub-contractors to assess their ability and suitability to undertake the work required? |  |

# 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 |  |
| 3.11 | 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 |  |

# 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 …………………………………………………………………..