University of Leicester Research Governance Office

Standard Operating Procedures

TR-SOP-5 UoL

Due Diligence

Version 2

Effective Date: 15th January 2025

This SOP will be implemented in line with this document's effective date for all UoL Sponsored research still in set up. For active clinical research that is already in the recruitment phase (or further) at the time of implementation, this SOP must be implemented within 3 months of the effective date.

Please note the appendices associated with this SOP may be subject to interim changes. Please ensure that appendices are downloaded from the RGO webpages prior to use to ensure the latest version of the document is being used. For active studies there is no requirement to update appendices to the latest version.

1.0 Introduction and Scope

This SOP is to set out the process in which due diligence is conducted, and if necessary escalated, for organisations the University of Leicester is looking at conducting research with or for.

2.0 Purpose

The purpose is to make it clear when a due diligence should be conducted and by whom. The document will also cover the decision-making process for when there are concerns over a potential organisation. This SOP applies to all research projects and should be used by anyone within Research Enterprises Division (RED)

3.0 Non-Compliance

Where it is identified that the processes detailed below has not been followed, this will initially be raised with the RED Team or Line Manager. And further discussions if required will then be held within the Trusted Research Team.
Non-compliance will be managed by the Director of Research and Enterprise or their delegate.

4.0 Responsibilities

Action	Undertaken by	Activity
Mandatory considerations when assessment of project and organisation is completed	Pre-Award & Contracts Team (PAC) Commercial Team & Research Partnership Development Team (RPD)	An initial internal due diligence check & assessment should be conducted on all proposed projects or organisation that a PI or academic will work with. This Due Diligence check will be completed by staff with Research & Enterprise Division (RED) The first-time staff see a project they should check & consider the following: • Is organisation already on WorkTribe as a funder or partner? • Has a full due diligence been completed within the last year? • Is the organisation marked as project specific? If yes to above, and marked as project specific the below must be considered.

		• Does the project description raise any new concerns that may not have been highlighted in the original due diligence to file? If yes; • Staff are to complete the Due Diligence Assessment & immediately contact Trusted Research for further guidance and advice. In some case a full Due Diligence does not need to be completed. For example: if the organisation is considered a UK public body such as; • Universities • NHS Trust • Central Government • Local Councils • Local Authority Schools
Completion, Submission & storage of Due Diligence Form	Pre-Award & Contracts Team (PAC) Commercial Team & Research Partnership Development Team (RPD)	Organisations working, collaborating or partnering with the University of Leicester on all types of research should have an active due diligence completed or already in place. Where required, a thorough & complete due diligence check should be conducted via Nexis Diligence & Due Diligence assessment completed using the Due Diligence Microsoft Form. https://forms.office.com/Pages/ResponsePage.aspx?id=as2-rtQxAUuVzoJ0r-hT2SCJKJY-Ee9AhNDrLLjUwuZUN0hSWlRLOFhTQVRKRlpKMUkyOTNTVEtWVCQlQCN0PWcu If there are any concerns, they should be escalated to Trusted Research Team. If an organisation has previously been escalated on a project specific basis, each time the organisation is added as a partner to a project a full due diligence refresh should be completed by RED & again the Due Diligence escalated to Trusted Research Team for review.

		Once a due diligence form has been completed and submitted, a copy of form, Nexis Diligence report and other supporting documents should be saved on the Shared Departmental X Drive, in a new folder with the organisation name on. In instances where a due diligence assessment is being completed on an individual, then "General Due Diligence – no Worktribe Setup required" and "see contract" should be added for any address details. If money is being devolved to a partner, the Further Due Diligence step outline below should be always be followed & if any concerns raised advice sought from The Trusted Research Team.
Further Due Diligence	Pre Award & Contract Team (PAC) Team	When the University is devolving research funding to a proposed partner, the Further Project Specific Due Diligence Form should be completed by the PAC team. Any publicly available policies the organisation has in place should be uploaded at this point. This will then highlight the need to request further information from the organisation via; • Due Diligence Questionnaire less than 50k May 2024 • Due Diligence Questionnaire more than 50k May 2024 All completed documents should then be filed within the organisation folder created within the Departmental X Drive. And any concerns escalated to the Trusted Research Team.
End-User Check	Trusted Research Team	If the due diligence relates to a company with ties to a country with an Arms Embargo, the due diligence should be referred to the Trusted Research Team. The Trusted Research Team may then conduct an End-User Check with the government to flag any military or WMD concerns. This will be done by;

		• Logging in to the UK Governments licensing portal and submitting a request on the End-User Advice Service. • Create a record on the Licences and End-User Log by adding the full party name, date of submission, Government reference number and any TRA reference. • Once a letter has been received with an outcome, this should be filed on the TRA folder. • In the event there are concerns, the status should be updated and a renewal date on the Licences and end-user log should be one year from the date of receipt of the letter. • In the event there are no concerns, the status should be updated on the Licences and End-User log and the renewal date should be set to 6 months from the date of receipt of the letter.
Escalated Due Diligence & Review	Trusted Research Team & RED Due Diligence Group	The Trusted Research Team are responsible to review all escalated due diligence assessments and will approve those they are able. Any due diligence that still requires escalation shall be assessed by the RED Due Diligence Group (“RDD”) as per the Terms of Reference.
Further Escalation Process	Trusted Research Team & Strategic Due Diligence Group	If further escalation of the Due Diligence is required, a summary form will be completed. This form is then forwarded by the Trusted Research Team to the Strategic Due Diligence Group (“SDD”). The SDD will then meet to discuss, following the Terms of Reference.
Highlight Project Specific	Pre-Award & Contracts Team (PAC)	Some due diligence will be approved on a project specific basis only. This will be highlighted by the person within PAC whom sets up the funder or partner in WorkTribe. An Asterix symbol * will be added to the end of the organisation name when the funder or partner is added to WorkTribe.

Highlight Renewal Date	PAC	Unless specifically noted, after escalation all organisations require their due diligence renewing after 2 years. This date should be noted by the person within PAC whom is setting the partner or funder up on the system & updated on the due diligence spreadsheet.

5.0 Development and approval record for this document

This table is used to track the development and approval of the document.

Author	Job title	Reviewed by	Approved by	Date approved
Reuben Sneller	Trusted Research Officer	Shaun Monkman	Cat Taylor	15th January 2025

6.0 Review Record

This table is used to track the changes made across document revisions.

Date	Version number	Reviewed by	Description of changes (If any)
May 2024	1.1	Reuben Sneller	Clarification on which partners have a full due diligence conducted.
Oct 2024	2.1	Rebecca Cash	Updates to process and type of system software used added