



**COLLEGE OF MEDICINE
FINANCIAL CONFLICT OF INTEREST PROCEDURES
FOR
RESEARCH, GRANTS AND RELATED ACTIVITIES**

EXECUTIVE SUMMARY

I. STATEMENT

It is the intent of the College of Medicine to proactively manage FCOI of its employees to prevent and mitigate against outcomes that may be detrimental to grant management, teaching, research, consultancy, operation of regulatory compliance committees, technology transfer efforts, intellectual property rights or the University operations at large. Employees responsible for the design, conduct, or reporting of research; engaging in technology commercialization, and / or related activities; management of research and capacity building grants and / or related activities; engaging in consultancies, private outside work or related activities shall, therefore, report Significant Financial Interests (SFI) and shall work with the University to avoid and manage any FCOI as necessary.

II. GUIDING PRINCIPLES

The integrity and reputation of the College of Medicine as an institution of higher learning is dependent on an atmosphere devoid of financial conflict and undue influence that may adversely affect scholarly work, integrity, judgment, conduct of sponsored activities and stewardship of resources and jeopardize public trust and support. This is of particular importance where the college and its staff interact with external parties.

While the College of Medicine recognizes the right of its staff and their immediate families to acquire personal financial assets and to establish financial relationships with outside entities, it is of paramount importance that the staff take full responsibility in managing their financial affairs and relationships in a manner that does not interfere with, or improperly influence, the performance of their professional duties and obligations. It is emphasized that requirement to disclose potential conflicts of interest for external evaluation is not a reflection or assessment of the integrity of the individual nor the fact that an individual may be determined to have an apparent conflict does not imply that the conflict is unethical or impermissible. The overarching principle is that Significant Financial Interests shall be disclosed and, as much as possible, financial conflicts of interest are avoided, reduced, eliminated or managed.

III. **SITUATION ANALYSIS**

It is critical that all handlers of such funds are of the highest integrity and financial probity. Prior to the development of these procedures, COM had no FCOI guiding document. Increasingly, research funders are requesting that COM has enforceable FCOI procedures for it to access research grants. It is therefore essential that COM develops enforceable FCOI procedures in line with good corporate governance practice.

Noted Key Challenges

The Procedures will address the following key challenges:

- (i) Limited awareness of FCOI among members of staff
- (ii) Lack of training of staff in FCOI
- (iii) Lack of institutional mechanism of disclosing, recording, managing and resolving FCOI among staff members in a contemporaneous manner.

Intended Procedures Objectives

The policy will ensure that COM

- (i) Creates awareness of FCOI among members of staff
- (ii) Trains staff in principles of FCOI;
- (iii) Develops procedures for comprehensive management of FCOI
- (iv) Establishes mechanisms of disclosure, coordination, management and dispute resolution of FCOI
- (v) Develops requisite human, financial and institutional capacity in FCOI management.
- (vi) Develops a monitoring and evaluation mechanism for FCOI.

IV. **APPLICABILITY**

All College of Medicine Affected Employees are required to report Significant Financial Interests held by themselves or by their Immediate Family which relate to the Affected Employee's Institutional Responsibilities. These procedures are intended to provide guidance to Affected Employees in disclosure of Significant Financial Interests and to College of Medicine officials in the management of financial conflicts.

V. **PROCEDURES MANAGEMENT**

Responsible Office: Grants Compliance Office

Responsible Officer: Director of Research Support Centre

Responsible Executive: Dean of Postgraduate Studies and Research

VI. **DEFINITIONS**

See College of Medicine Procedures for Financial Conflicts of Interest Procedures Document.

VII. **PROCEDURES**

See College of Medicine Procedures for Financial Conflicts of Interest Procedures Document.

VIII. SANCTIONS

The Dean of Postgraduate Studies and Research shall invoke the standard disciplinary procedures contained in Conditions of Service of College of Medicine employees to impose sanctions for violation of FCOI procedures. Other sanctions that might be imposed include but are not limited to:

- Retrospective Review to determine whether any externally-funded activity, or portion thereof, conducted during the time period of the noncompliance, was negatively affected in the design, management or reporting and submission of a Retrospective Report to the appropriate responsible official and/or applicable funding agency;
- Freezing expenditures from involved funds or terminating sponsored or other agreements;
- Revocation of the privilege for engaging in research, sponsored activities, technology transfer and commercialization and/or other scholarly activities;
- Appointment of an independent monitor capable of taking measures to protect the design, conduct, and reporting of the research against bias resulting from the financial conflict of interest;
- Modification of the research or grant plan with clearly specified actions that have been, and will be, taken to manage such financial conflict of interest going forward;
- Change of personnel or personnel responsibilities, or disqualification of personnel from participation in all or a portion of the research;
- Reduction or elimination of the financial interest (e.g., sale of an equity interest); or
- Severance of relationships that create financial conflicts.

IX. EXCLUSIONS

Not Applicable.

X. INTERPRETATION

The authorized institutional representative is, for the purposes of these procedures, the Dean of Postgraduate Studies and Research.

XI. EFFECTIVE DATE

16th February 2021