

POLICY AND PROCEDURES ON CONFLICT OF INTEREST IN RESEARCH

I - INTRODUCTION

The University of Buea aims to create conditions for a research environment that fosters the development of new knowledge and creative learning opportunities for students and researchers while preserving its research spirit's moral integrity and reputation and the trust of the end users of its research output and the general public. Therefore, it is required that all individuals involved in research activities in the University of Buea avoid or mitigate actual or perceived financial conflicts of interest to ensure that their actions and interests do not conflict with their obligations towards the University of Buea.

This policy is designed to conform to the general regulations regarding Financial Conflicts of Interest, including those required by external research partners of the University of Buea. They need that all individuals who participate in the design, conduct, or reporting of funded research complete training on financial conflicts and declare any personal financial interests that could give rise to an actual conflict of interest or the appearance of a conflict of interest.

The Deputy Vice-Chancellor in charge of Research, Cooperation and Relations with the Business World (DVC/RCB) through the Division of Research and Publications (DRP) shall ensure that all actors implement this policy.

II - DEFINITIONS

Research: any systematic investigation, study, or experiment designed to contribute to generalizable knowledge in all areas. The term encompasses basic and applied research (e.g., a published article, book or book chapter) and product development.

Investigator: Any principal investigator, project manager, research analyst, or member of the research team identified as senior/key personnel on a research project and other individuals that the principal investigator/project manager identifies as responsible for or having substantial independent decision making concerning the design, conduct or reporting of research, including collaborators or consultants.

Family: Spouse or dependent children.

Financial Interest: Anything of monetary value, whether or not the value is readily ascertainable.

Financial Conflict of Interest (FCOI): A Significant Financial Interest that could directly and significantly affect the design, conduct or reporting of research.

Institutional Official: The individual within the University of Buea designated as responsible for the management of this policy, including the solicitation and review of disclosures of Significant Financial Interests, training of Investigators, record retention, and reporting to funding agencies sponsors and the public as detailed herein.

Significant Financial Interest (SFI):

A **financial interest** consisting of one or more of the following interests of the Investigator (aggregated together with those of the Investigator's family) that reasonably appear to be related to the Investigator's Institutional Responsibilities:

- (1) **Any remuneration** (salary, payment of services identified as salary such as consulting fees, honoraria, royalties, paid authorship) received from any **publicly traded entity** in the twelve months preceding the disclosure if the value of the remuneration and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds 1,000,000 FCFA.
- (2) **Any remuneration** (salary, payment of services identified as salary such as consulting fees, honoraria, royalties, paid authorship) received from any **non-publicly traded entity** in the twelve months preceding the disclosure if the value of the remuneration and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds 1,000,000 FCFA.
- (3) **Intellectual property rights and interests** (e.g., patents, copyrights) and significant financial interest exist upon receipt of income related to such rights and interests; or any third party.
- (4) **Reimbursed or sponsored travel** (i.e., paid on behalf of the Investigator and/or his/her family) related to the Investigator's Institutional Responsibilities. This disclosure requirement excludes travel paid for by the University of Buea or reimbursed or sponsored by any public governmental institution.
- (5) **Holding any position of influence** (e.g., Dean, Vice-Dean, Director, officer, trustee, faculty) in an entity different from the University of Buea and related to the Investigator's Institutional Responsibilities.

The term significant financial interest does not include the following:

- (1) Salary, royalties, or other remuneration paid by the University of Buea to the Investigator if the Investigator is currently employed or otherwise appointed by the University of Buea, including intellectual property rights assigned to the University Buea and agreements to share in royalties related to such rights.
- (2) Income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made in these vehicles.
- (3) Income from seminars, lectures, or teaching engagements sponsored by any public governmental institution.
- (4) Income from service on advisory committees or review panels for a public governmental institution.

III – PRINCIPLES

An Investigator's first and primary responsibility is to support and advance the University of Buea's research mission rather than advance their personal and/or familial financial interests. Extra scrutiny must be given to potential FCOI in research involving human subjects. Disclosure of SFI is necessary for the identification of FCOI. All Investigators covered by this policy are thus required to disclose Financial Interests that could affect or be affected by research on which they are working or proposing to work for on behalf of the University of Buea. Every Investigator must become familiar with and abide by the provisions of this policy and undergo regular training as described herein. Any Investigator with questions regarding financial conflicts of interest or this policy should contact the Institutional Official (Division of Research and Publications) for assistance. The University of Buea will review and manage, minimize, or eliminate SFI to ensure that research will be free from bias resulting from Investigator financial interests. This regulatory role is played by the (DVC/RCB) through the Division of Research and Publications. In this line, the DRP shall be responsible for the following:

- (1) Permanently update this policy and ensure that it is available on the University website.
- (2) Design and implement a training module on all aspects of FCO, including:
 - a. The institutional policy of FCOI in the University of Buea
 - b. Institutional policy in partner institutions, including PHS funding requirements (**42 CFR Part 50 Subpart F**).
 - c. Investigator's disclosure responsibilities.
 - d. Review and management of FCOI.
 - e. Understanding management of SFI.
- (3) Implement and monitor compliance with this policy by all researchers and other relevant actors.
- (4) Receive and perform a preliminary review of Financial Disclosure Forms submitted by researchers.
- (5) Determine all requirements from partner research funding institutions regarding FCOI and ensure that the institution respects them.
- (6) Attend to all requests from investigators and the public on issues regarding the policy of the University of Buea on FCOI.
- (7) Collaborate with the FCOI committee and ensure implementation of all decisions and sanctions taken by this committee under the authority of the DVC/RCB.
- (8) Maintain all records and archives relating to training, disclosures, review and management of FCOI

IV - TRAINING

Each Investigator must complete a training module on Financial Conflict of Interest before engaging in research. The training will be offered based on the module provided by the DRP of the University of Buea, and other training offered by external institutions (such as Citiprogram®) and deemed acceptable by the University of Buea will be considered. The training must be repeated every 03 (three) years as long as the research project continues and whenever the University of Buea revises this policy.

V - DISCLOSURE PROCEDURES

Disclosure of FCOI shall be done on the Financial Disclosure Form (FDF) provided by the university and downloadable on the University website. This form will be filled annually and submitted to the Division of Research and Publications of the University of Buea by all key personnel involved in ongoing research activities and projects. An additional ad-Hoc FDF must be submitted in the event of changes significantly modifying the FCOI status during a given project. In such a situation, the ad-Hoc form shall be submitted within 30 days of the significant change. For all internally or externally sponsored research projects, the FDF must be filled before submitting a letter of intent or the research proposal.

VI - REVIEW, MANAGEMENT AND REPORTING PROCEDURES

The Institutional Official (the DRP) will receive all FDF and conduct a preliminary review regarding any form that identifies a Significant Financial Interest (SFI). Situations of SFI disclosed or not requiring an inquiry will be immediately reported to the DVC/RCB, who alone can order an investigation.

After this preliminary review and inquiry, all forms with an identified SFI will be forwarded to the Financial Conflict of Interest Committee (FCOIRC) with the recommendation of the Division of Research and Publications.

This committee shall meet bi-annually on the convocation of the Deputy Vice-Chancellor in charge of Research, Cooperation and Relations with the Business World. An extraordinary meeting of the committee may be called to attend to a submitted ad-hoc FDF and within 30 days of such submission if deemed necessary by the Deputy Vice-Chancellor in charge of Research, Cooperation and Relations with the Business World.

The FCOI Committee is ultimately responsible for deciding whether a Financial Conflict of Interest exists by determining if the SFI identified is likely to directly and significantly affect the proposed research's design, conduct, or reporting. It will be responsible for reviewing cases forwarded formally by the DRP and any other case brought otherwise to their attention. Members of the committee might request additional documentation to enable them to analyze a specific situation thoroughly. The FCOI committee will also propose the appropriate actions to be engaged to manage, reduce or eliminate any Financial Conflict of Interest by presenting an FCOI Management Plan to the Division of Research and Publications. The management plan could include suggestions of corrective measures, sanctions on researchers and other collaborators, reporting the SFI to the funder or research partner, reporting to the Institutional Review Board in cases of research involving human subjects, etc. these measures could be disclosed to a third party if required by the law.

VII - COMPLIANCE

Decisions taken by the FCOI committee shall be notified to the researcher within seven working days. They will also be made available to the public on request. Corrective measures and sanctions will be implemented immediately after notification to the researcher under the supervision of the DRP, which reports to the DVC/RCB. Researchers who fail to comply with this policy and with the decisions of the FCOI committee are subject to suspension of their research activities and other disciplinary measures provided by the rules and regulations of the University of Buea.

If reporting to the funder is decided, this shall be done by a letter of the DVC/RCB within 30 days after the committee's decision.

Suppose an FCOI is not identified and managed in a timely manner for whatever reason. In that case, a retrospective review of the Investigator's activities over the period not covered is performed by the DRP to determine any bias during the period of non-compliance. The results of this retrospective review shall be submitted to the FCOI review committee.

VIII - SUB-RECIPIENT MANAGEMENT AND MONITORING

When the University of Buea receives a sub-award from a partner institution to conduct a significant portion of research activity or project, the University of Buea is committed to abiding by the policy of the awarding institution regarding FCOI.

If the University of Buea issues a sub-award to an external partner organization, the sub-awardee will be expected to fully abide by this policy. All identified SFI will be expected to be reported to the University of Buea within 30 days of its identification.