

Disclosure of Interest and Management of Conflicts of Interest Procedure

Intent

Conflicts of interest in research are common and it is important that they are disclosed and dealt with appropriately. Conflicts of interest have the potential to compromise judgements and decisions that should be made impartially. Such compromise could undermine community trust in research. Financial conflicts of interest are foremost in the public mind but other conflicts of interest also occur in research, including personal, professional and institutional advantages.

In compliance with the principles of the [*JCUS Code for the Responsible Conduct of Research \(Research Code\)*](#), and the [*JCUS Managing and Investigating Potential Breaches of the JCU Code for the Responsible Conduct of Research Procedure*](#), this Procedure assists researchers to understand and apply best practice in disclosure of interest and managing conflicts of interest. Some of the definitions and other text in this Procedure are reproduced from the NHMRC Guide, Disclosure of interests and management of conflicts of interest.

Scope

This Procedure explains the expectations of the management and disclosure of conflicts of interest staff and students engaged in research under JCU auspices.

Definitions

Conflict of Interest	In accordance with the JCU Research Code, a conflict of interest exists in a situation where an independent observer might reasonably conclude that the professional actions of a person are or may be unduly influenced by other interests. This refers to a financial or non-financial interest which may be a perceived, potential or actual conflict of interest.
Head of Work Unit	Means the manager of a Division College, Institute, Centre, Directorate or any successor structure. A Head of Work Unit would be a staff member in one of the following roles: Dean, Director, DVC, Provost or Vice Chancellor.
JCU Research Code, Research Code	James Cook University (JCU) Code for the Responsible Conduct of Research

Procedure

1. Disclosure of Interests

JCU requires disclosure of all interests that are relevant or could appear to be relevant, to proposed or ongoing research. These interests could be actual, perceived or a potential conflict of interest. Where required, relevant interests may also need to be disclosed to funding bodies, research participants, publishers, journal editors, collaborators and the public.

Institutions may also have interests that are relevant to individual research projects or research programs that may be relevant for disclosure to researchers, funding bodies, research participants, publishers and journal editors, collaborating institutions or the public.

Types of Interest

Financial

Financial interests** that require disclosure include, but are not limited to:

- Direct payments to a researcher, such as salary, consultancy payments, speaking fees, panel memberships;
- Indirect payments to the researcher, for example funding of travel, accommodation, professional development, hospitality;
- Payments to support research, such as funding from an industry or interest group;
- Company shares or options;
- Royalties;
- Directorships;
- Some Scholarships;
- Operational or infrastructure support;
- Future expectations of a benefit, e.g. proceeds commercialisation, spin-off company or shares.

**Disclosure may also be required when a financial interest of the kind listed above is held by a member of a researcher's immediate family.

The significance of the financial interest should also be considered when disclosing a conflict of interest including, but not limited to:

- The monetary value of the payment, gift or interest;
- The significance that a reasonable, independent observer would attach to the payment, gift or interest;
- The circumstances under which a gift or payment is made, for example, if the gift or payment is a regular payment or single instance.

Non-financial interests

Non-financial interests that require disclosure include, but are not limited to:

- Any board membership (even if unpaid) or other affiliation with an organisation that could stand to benefit from or be affected by the research;
- Personal or social relationships and current and past professional relationships;
- Recent employment with, or role in, organisations with financial links or affiliations with industry groups that could stand to benefit from or be affected by the research.

2. Identifying and managing conflicts of interest

Having a conflict of interest does not, in itself, imply improper motivation or individual wrongdoing, but once a conflict of interest is identified, appropriate measures must be taken to manage the particular conflict of interest and situation. Measures should be tailored to the individual circumstances and could include, but are not limited to:

- researcher playing a different or less central role in the research;
- involvement of an appropriate individual to oversee some or all of the research activity;
- researcher divesting her/himself of financial or other interests and/or resign from the membership entities whose interests could be affected by the research.
- the public disclosure of material interests (e.g. when presenting or publishing the research).
- researcher absenting themselves from any deliberative decision making regarding the research.

3. Record of management of conflict of interest

If a conflict of interest is disclosed or identified the supervisor or Head of Work Unit must manage the conflict of interest in accordance with the guidance in this Procedure. The Head of Work Unit must retain a record of how the conflict of interest was managed (with appropriate consideration of confidentiality requirements) and provide the details (including any details of the research grant affected) to the Deputy Vice Chancellor/Head of Campus Singapore through the Dean of Research Singapore.

4. Researcher responsibilities

The size of the Singaporean research community and expert pool in specific research areas can lead to individuals being linked in some way with the design or conduct of a research project through consultation and the provision of expert advice. Whether this consultation or relationship gives rise to a conflict of interest must be determined but it should be recognised that some interests may be complementary or may constitute a mutuality of interest, rather than constituting a conflict of interest.

JCU recognises that researchers may be conflicted from time to time and therefore requires a researcher to acknowledge the conflict and make disclosures as appropriate. Researchers must:

- Maintain records of activities that may be relevant to the assessment of whether a conflict of interest exists (e.g. consultancies; membership of boards of directors, advisory groups, or committees; or receipt or delegation to receive funds, services or equipment from outside bodies to support research activities).
- Disclose any material interest in a timely fashion (i.e. as soon as it becomes apparent that the interest could constitute a potential, actual, or perceived conflict of interest).
- Update any disclosures of interest as circumstances change, and at least annually during the period where the research remains active.

5. Training and Education

Researchers have an obligation to engage in the training and education provided by JCU in regard to their responsibilities under the Research Code, including disclosure of interests and management of conflicts of interest.

6. Resolution of disputes

In the first instance, disputes over the identification or management of a conflict of interest involving JCU researcher/s must be mediated by the Head of Work Unit. If the dispute is unable to be resolved satisfactorily, the matter must be escalated to the Deputy Vice-Chancellor of the relevant Division.

If the dispute involves allegations of a potential breach of the Research Code refer to Section 7 of this Procedure for advice.

7. Potential breaches of the JCU Research Code

Any concerns or complaints about potential breaches of the Research Code in relation to disclosure of interests and management of conflicts of interest must be managed in accordance with the *JCUS Managing and Investigating Potential Breaches of the [JCU Code for the Responsible Conduct of Research Procedure](#)*. Examples of breaches of the Code that are related to disclosure and conflicts of interest include, but are not limited to:

- Failure to disclose a relevant interest;
- Failing to abide by any decisions as to the management of a conflict of interest.

Related policy instruments

[JCUS Code for the Responsible Conduct of Research Policy \(Research Code\)](#)

[JCUS Managing and Investigating Potential Breaches of the JCU Code for the Responsible Conduct of Research Procedure](#)

[JCUS Code of Conduct](#)

[JCUS Code of Conduct Explanatory Statement](#)

Related documents and legislation

JCUA Conflicts of Interest Guidelines

JCUA Fact Sheet Conflicts of Interest

Administration

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Version	Revision date	Details of changes	Author
1.0	17/03/2021	Procedure adapted from JCUA and amended to align with JCUS Code for Responsible Conduct of Research	Caryn West
20-1	23/11/2020	Procedure established to support the JCU Code of the Responsible Conduct of Research Policy	Manager, Research Grants, Ethics and Integrity – JCU Connect

Contact Person/Unit

Contact Person/Unit:	Prof Caryn West, Dean of Research Singapore Ms Belinda Lee, Research Support
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