

Kwame Nkrumah University of Science and Technology, Kumasi

# Conflict of Interest in Research POLICY



# CONFLICT OF INTEREST IN RESEARCH POLICY



KWAME NKURUMAH UNIVERSITY OF SCIENCE  
AND TECHNOLOGY, KUMASI-GHANA  
**QUALITY ASSURANCE AND  
PLANNING UNIT**

© 2019 QAPU-KNUST

ISBN: 978-9988-2-8487-9

No part of this publication may be reproduced, stored in a retrieval system or transmitted in any means; electronic, mechanical, photocopy, recording or otherwise, without the written authorisation of the publisher and copyright owner.

Quality Assurance and Planning Unit  
Vice-Chancellor's Office  
Kwame Nkrumah University of Science and Technology  
KNUST, Kumasi  
PMB UPO, Kumasi-Ghana

Tel: +233 322060319

Email: [info.qapu@knust.edu.gh](mailto:info.qapu@knust.edu.gh)

Layout Design by  
Frank Boadu, University Press, KNUST

Cover Design  
Francis K. N. Nunoo, Department of Publishing Studies, KNUST

# FOREWORD

The Kwame Nkrumah University of Science and Technology, Kumasi has a mission to advance knowledge in science and technology through creating an environment for undertaking relevant research, quality teaching, entrepreneurship training and community engagement to improve the quality of life. In order to achieve this mission, there is the need to have Conflict of Interest in Research Policy.

The rationale of this policy is to develop and maintain a system of effective health service delivery, ensure safety and welfare for staff and students.

The University is grateful to all those who ensured the initiation, development and approval of this Policy.

**PROFESSOR K. OBIRI-DANSO**  
VICE-CHANCELLOR



# ACKNOWLEDGEMENT

As part of the strategic planning mandate of the Quality Assurance and Planning Unit (QAPU), University policies are initiated and proposed for approval by the Academic Board. The Unit in collaboration with the Office of Grants and Research (OGR) therefore initiated the preparation of the Conflict of Interest in Research Policy and submitted for approval by the Academic Board.

The QAPU is grateful to Prof. R. C. Abaidoo (Director), Dr. Owusu Amponsah (Department of Planning), Mrs. Amanda Owusu-Asare (Assistant Registrar) and the entire staff of OGR for their invaluable contributions to this policy. A special thanks goes to the Building Stronger Universities Project (BSU111) for providing financial and technical support for developing grants related policies in the University including the Conflict of Interest in Research.

Lastly, we wish to appreciate the work of the Review Committee and all staff of the University who contributed in several ways to the development and approval of this Policy.

**PROF. CHRISTIAN AGYARE**

HEAD, QAPU

JUNE, 2019

**OFFICIAL COPY CAN BE OBTAINED FROM:**

Telephone Number: 0322060319

E-mail: [info.qapu@knust.edu.gh](mailto:info.qapu@knust.edu.gh)



# TABLE OF CONTENTS

<b>Foreword</b>	<b>iii</b>
<b>Acknowledgement</b>	<b>iv</b>
<b>1.0 Introduction</b>	<b>1</b>
<b>2.0 Purpose of the Conflict of Interest Policy</b>	<b>3</b>
<b>3.0 Definitions</b>	<b>4</b>
3.1 Conflict of Interest	4
3.2 Conflict of Commitment	6
3.3 Disclose/Disclosure	7
3.4 Institutional Responsibilities	7
3.5 Investigator and Principal Investigator	7
3.6 Research	8
<b>4.0 Registering an Interest and Procedures for Conflict of Interest</b>	<b>9</b>
4.1 Procedures	9
4.2 Access to Disclosures	13
4.3 Sponsored Projects	14
<b>5.0 Managing Conflict of Interest</b>	<b>16</b>
<b>6.0 Appeals</b>	<b>19</b>
<b>7.0 Compliance with the Policy</b>	<b>20</b>
<b>8.0 Non-Compliance</b>	<b>21</b>
<b>9.0 Effect on Collective Agreements</b>	<b>23</b>
<b>10.0 Training</b>	<b>24</b>
<b>11.0 Record Retention</b>	<b>25</b>
<b>12.0 Regulatory Authority</b>	<b>26</b>
<b>13.0 Acknowledgements</b>	<b>27</b>



# 1.0 INTRODUCTION

The Kwame Nkrumah University of Science and Technology (KNUST, hereafter referred to as the University) is committed to overseeing the conduct of research in a manner that ensures the integrity of the research process and maintaining the trust of the researchers, and that of sponsors in the integrity and credibility of its faculty, staff and research programmes. This commitment requires the University to ensure that there is no reasonable expectation that research results are biased by the external commitments and/ or interests of persons who are responsible for the design, conduct, reporting and/or direct administration of University research. In this regard, the University's faculty, staff, and administrators (employees) are required to comply with standard procedures to identify and eliminate interests that are likely to undermine the integrity of the research process and outcomes. Complying with standard procedures is borne out of the notion that the University's employees are committed to the core values and mission of the university. The mission is guided by the principle that the University operates for the common good of community by ensuring the preservation and advancement of knowledge; and not simply to further the interest of either individual employees or the University. Therefore, employees are required to avoid conflicts of interest that may impair the public trust and compromise their performance and effectiveness in carrying out their University responsibilities. Knowledge of the standard procedures for declaring and resolving conflicts of interest at the start of research projects is imperative. It is within this context that the Conflict of Interest Policy lies.

For the purpose of this policy, research covers all sponsored projects, including research and extension, and all non-sponsored university research. This policy identifies and addresses the real or apparent conflicts of interest that result from the intersection of research activities and personal interests, and defines the requirements of all

employees to ensure the research activities are conducted objectively and without consideration to personal gains. The policy is based on the expectation that employees will conduct their affairs in a manner that avoids or minimises conflicts of interest, and must respond appropriately when conflicts of interest arise. To this end, this policy informs researchers about situations that amount to conflicts of interest related to research, provides mechanisms for the employees and the University to manage those conflicts of interest, and describes situations that are prohibited. If a situation raises questions of conflict of interest, the employee is obliged to discuss it with the office responsible for the management of conflicts of interest in research. Every employee has an obligation to abide by the provisions of this policy. Violation of any of the policy provisions constitutes grounds for disciplinary and/or other administrative action pursuant to University policy.

## 2.0 PURPOSE OF THE CONFLICT OF INTEREST POLICY

The overall purpose of the Conflict of Interest Policy is to establish a method to protect the University community from questionable circumstances that might arise and to resolve any apparent or real conflicts in the research process. Specifically, the policy seeks to:

- assist in identifying conflicts of interest in research;
- establish a system for disclosure of conflicts of interest in research;
- provide guidance to those responsible for dealing with conflicts of interest in research; and
- assist in the resolution of conflicts of interest to protect the University and its employees;

Accordingly, this Policy establishes standards and requirements to protect the well-being, reputation, and legal obligations of the University. The University will draw attention to this Conflicts of Interest Policy during training and induction processes for newly appointed academic, research and professional staff.

## 3.0 DEFINITIONS

### 3.1 CONFLICT OF INTEREST

Conflict of interest is used in this policy document to refer to the situation where there is a potential or actual divergence between the personal interests of a university employee and that member's obligation to uphold the interests and mission of the university OR a situation in which an individual's financial, professional, or other personal considerations may directly or indirectly affect, or have the appearance of affecting, the individual's professional judgment in exercising any duty or responsibility of the University.

Conflict of interest situations take many forms, which include but not limited to cases in which a University employee:

- conducts a review, assessment or evaluation of a project or a staff, the outcome of which may affect the university staff's personal interests.
- conducts or participates in a research project which may affect his or her financial interests or those of a related business.
- is party to a decision on the part of the university to enter into a contract that may affect a family member's financial interests.
- supervises a graduate or undergraduate student employed by a business in which the university member has a financial interest.
- grades work done by a student to whom the university member is related or with whom he or she has an intimate personal relationship.
- participates in a university recommendation or decision that affects the employment of a partner, spouse or other family member.

- uses university resources for private business purposes.
- uses information acquired in the course of conducting university activities, which is not in the public domain, to advance a staff's personal or financial interests or those of a related business.

In any of the cases listed above, the personal interests of the university employee may diverge or reasonably be perceived to diverge from his or her obligations to uphold the University's mission and interests.

Within this policy, the following terms shall be interpreted as follows:

- "Business" means any corporation, partnership, sole proprietorship, firm, franchise, association, organisation, holding company, joint stock company, business or real estate trust or society, or any other separate legal entity organised for profit or charitable purposes;
- "Financial interest" means an interest in a business consisting of (a) any stock, stock option or similar ownership interest but excluding any interest arising solely by reason of investment in such business by a mutual fund, pension fund, or other institutional investment fund over which the university member does not exercise control; or (b) receipt of, or the right or expectation to receive, any income or benefit from such business whether in the form of a fee (e.g. consulting), business, salary, allowance, forbearance, forgiveness, interest in real or personal property, dividend, royalty derived from the licensing of technology, rent, capital gain, real or personal property, or any other form of compensation, or any combination of the foregoing;
- Financial interest does NOT include: a) salary, royalties, or other remuneration from the University; b) income from the authorship of academic or scholarly works; c) income from seminars, lectures, or teaching engagements sponsored by or from advisory committees or review panels for governmental agencies; institutions of higher education, research institutes affiliated with institutions of higher education, academic

teaching hospitals, and medical centres; or d) equity interests or income from investment vehicles, such as mutual funds and retirement accounts, so long as the University employee does not directly control the investment decisions made in these vehicles.

- “Personal interests” means the personal, private, or financial interest of a university member or closely associated person or related business;
- “Closely associated person” means a person related by blood, adoption, marriage, or common law marriage to the University member or a person with whom a University member has an intimate personal relationship;
- “Related business” means a business or society in which the University employee or any closely associated person:
  - a. has a financial interest;
  - b. acts as a trustee, director or officer;
  - c. acts in a position as an employee, agent or otherwise which includes responsibility for a segment of the operation or management of a business; or
  - d. acts in a position as an employee, agent or otherwise which includes responsibilities for influencing or determining the scientific direction of the corporation.
  - e. “University employees” means all staff of the University including full-time, part-time and student employees, and any other person while acting on behalf of or at the request of KNUST including, but not limited to, members of a university committee, persons giving advice to the university at the request of the university and anyone involved in a university decision-making process.

### **3.2 CONFLICT OF COMMITMENT**

When an employee of the University engages in an outside activity that burdens or interferes with their fulfilment of primary commitments

and obligations to the University, even if the outside activity is valuable to the University or contributes to their professional development and competence. External Commitment refers to an obligation or activity (e.g., management, employment, advisory, or consulting role) that is not related to primary commitments or obligations to the university). External Entity also refers to an entity other than the University.

### **3.3 DISCLOSE/DISCLOSURE**

To provide relevant information about an employee's interests related to a research project to parties inside and outside the institution to assure full awareness of potential conflicts and institutional efforts to address them.

### **3.4 INSTITUTIONAL RESPONSIBILITIES**

Activities of employees of the University that contribute to, arise out of, or are impacted by research, teaching, service, outreach, publications, professional/clinical practice. This includes consulting, lectureships, service on external panels or committees, expert witness testimonies, book promotions, etc. that are related to or arise from KNUST's activities.

### **3.5 INVESTIGATOR AND PRINCIPAL INVESTIGATOR**

#### **“Investigator”:**

An investigator refers to a Principal Investigator or Project Director, participating Investigators and Senior/Key Personnel identified as such by the institution in a proposal or report to a sponsor and any other person identified by the Principal Investigator as responsible for the design, conduct or reporting of a sponsored research project.

### **“Principal Investigator”:**

A person designated by the University with the title of “Principal Investigator” of a Research or other sponsored project or otherwise having primary responsibility for the management and conduct of a Research or other sponsored project, including a project director.

## **3.6 RESEARCH**

It is a systematic investigation, including research development, testing and evaluation, designed to develop or contribute to generalisable knowledge. It also includes any activity for which research funding is available through a grant or cooperative agreement, research grant, career development award, centre grant, individual fellowship award, infrastructure award, institutional training grant, programme, project, or research resources award.

## **4.0 REGISTERING AN INTEREST AND PROCEDURES FOR CONFLICT OF INTEREST**

### **4.1 PROCEDURES**

- 4.1.1 All University employees involved in research, both full and part time, are required to complete and submit, or review and confirm, an Annual Return to the Office of Grants and Research in August of each year. A null return needs to be submitted if a member of staff is not involved in any relevant external activities.
- 4.1.2 This Return does not in any way replace or supersede the requirement for staff to seek permission from their Head of Department, Dean, the Provost, or Office of Grant and Research for certain activities, as set out in the terms and conditions of the University's Policy and individual contracts of employment.
- 4.1.3 The Register is maintained by the Office of Grant and Research and can be completed through submission of a register of interest in print (see Appendix A).
- 4.1.4 In addition to any Register of Interest declarations, it is the ongoing duty and responsibility of every member of staff to recognise and disclose conflicts of interest (whether actual or potential, financial, academic, personal or otherwise) or any circumstances that might reasonably give rise to the perception of conflict of interest. All staff, and especially those in a position of authority, are expected to be honest, open and transparent where their personal or business relationship has or may be perceived to influence the operation of the University business,

so that the effect of the conflict situation can be minimised and appropriately managed at the earliest opportunity.

The best practice is to actively consider a potential for a conflict of interest at the outset of every new activity/external project, as well as how it may/will affect the activity in question and/or the University in general.

- 4.1.5 It is recommended that whenever a new external project or other activity is initiated, a conscientious assessment of any potential conflict(s) of interest is actively undertaken by all individuals who are going to be involved. How the potential/identified conflict(s) of interest might/will affect the activity in question and/or the University in general should also be assessed.
- 4.1.6 If a member of staff is unsure whether their interests conflict, it should be assumed that a conflict of interest exists. Advice should be sought from the Office of Grant and Research for appropriate action to be taken. Equally, if the Office of Grants and Research and any Appropriate Person becomes aware of the possible conflict situation, which appears not to be considered by an individual employee, it should be brought to that individual's attention for appropriate consideration.
- 4.1.7 Any issues raised under this Policy should be dealt with in a prompt, fair, reasonable and objective manner, paying due attention to the effects of any actions taken on the University standing, as well as the individual's work and reputation.
- 4.1.8 Disclosure should be made at the time the conflict first arises, or when it is recognised that a conflict might be perceived, in writing to the following persons copying the Office of Grants and Research:
- *Staff: The Head of Department.*
  - *Students and researchers: the individual's Tutor /Supervisor.*
  - *Provost and Deans: The Vice-Chancellor.*
  - *Vice-Chancellor: The Chair of Council.*

- *Consultants: The Department or Faculty contracting for the service.*
- *External members of the University Council, Committees, or Panels: the relevant Chair (or in the case of the Chair the Deputy Chair).*

4.1.9 If in any case the Appropriate Person has an interest in the matter to be discussed, the disclosure should be made to the person at the next higher level of authority.

4.1.10 Where the conflict of interest relates to the activities outside the control of the Appropriate Person, the conflict must be disclosed to the person responsible for those activities, and the Appropriate Person should be also informed. In cases where an employee has multiple reporting responsibilities disclosure should be reported to the primary unit head, and other superiors should be informed in writing of the potential conflict of interest situation.

4.1.11 All disclosures should include enough information to allow for adequate evaluation and resolution, such as:

- *The type of potential conflict (financial conflict of interest or conflict of commitment etc.).*
- *The nature of the activity.*
- *A description of all parties involved.*
- *The potential financial or non-financial interests and rewards.*
- *Any other relevant information.*

4.1.12 A sample Declaration of Interests Form is available in Appendix A and B.

4.1.13 In all cases the disclosure, its outcome, and all subsequent decisions and actions should be noted in writing and must be kept confidential as far as possible in line with the Ghana Data Protection Act 2012. To protect the privacy of individual members of staff or students any disclosures made should be

only made available to appropriate individuals with justifiable reasons for access.

4.1.14 Staff are expected to use their judgement and consider whether the potential/actual conflict of interest is likely to have a direct or indirect effect on the University's business and integrity in general.

This should be discussed with the Appropriate Person and agreed who will be responsible, if regarded as appropriate, for informing all relevant University departments or faculties which will/ could be affected by the conflict of interest situation.

This will be needed where the relevant department or faculty is advising on, deciding on, or negotiating a matter under the instructions of the individual with potential/actual conflict of interest, and where withholding such information could have a detrimental effect on the University's business and/or integrity, and be dishonest and unethical conduct. This may include, but is not limited to informing:

- *The Finance Office*
- *Procurement Office*
- *Human Resources Department*
- *Office of Grants and Research*

Any disclosures received by the affected departments or faculties must be kept confidential as far as possible as per point 4.1.13 above.

4.1.15 Where a conflict of interest relates to an individual's role on a University Committee, Panel or Group, it should be discussed with the Chair of the Committee, Panel or Group in the first instance. If the disclosed conflict of interest is substantial and cannot be managed, the individual should recuse themselves and no longer participate in any discussions or decision-making process. If the Chair has an interest in the matter disclosed, a Deputy Chair should be appointed to review the conflict of interest and decide what further steps should be taken to

manage it appropriately. Any disclosure should be made at the earliest possible time.

4.1.16 The Appropriate Person shall advise the Head of Department, Dean, the Provost, or Director of the Office of Grants and Research of all disclosures. The Director of the Office of Grant and Research may also serve as an advisor to staff members who are uncertain regarding the appropriateness of a given activity, or management of a given disclosure issue. It is therefore incumbent upon them to be familiar with the University policies, and with general legal requirements, to understand fully the implications of the situation in question. If the conflict situation involves the one to disclose to (student supervisor, Head, Dean or Provost), it should be disclosed to the person at the next higher level of authority as indicated in points 4.1.8 above.

4.1.17 The Appropriate Person, the Director of Office of Grant and Research, or the person at the next higher level of authority, if appropriate, may consult or engage Legal Services, Finance, or other relevant departments, to advise on the issues of law, budget and finance, research administration, government relations or technology transfer. Any information shared must be kept confidential as per point 4.1.13 above by all the parties receiving it.

4.1.18 Any allegations of conflict non-disclosure may be raised under the University's Policy which shall apply as appropriate in relation to conflicts of interest, and those raising concerns in good faith will not be penalised.

## **4.2 ACCESS TO DISCLOSURES**

Disclosures made under this policy will normally be treated as confidential. However, to meet the objectives of the policy, it will sometimes be necessary for the University to permit persons within the University, and, in some circumstances, persons outside the University, access to information about such disclosures. Reasonable efforts shall

be made to advise the University member in writing before such disclosures are made available to persons outside the University.

Disclosures may be made available to third parties when required by University or statutory regulation (including Freedom of Information/Protection of Privacy) or by due process of law. University employees should be aware that disclosure of conflicts of interest may be required for other University processes. For example, whenever a University employee is engaged in research which involves a conflict of interest, it might be necessary or appropriate for the employee to disclose the conflict to a University Ethics Committee which is reviewing the research. This would be especially important where the conflict might adversely affect the research design or subjects of the research. In addition, University employees may voluntarily disclose to others any conflict of interest involving themselves and the decision relating thereto that previously has been disclosed by the University member pursuant to this policy.

### **4.3 SPONSORED PROJECTS**

The Office of Grants and Research under the office of the Vice Chancellor is the designated office responsible for dealing with Conflict of Interest for sponsored projects in the University. The Office may however form a committee that would be authorised to receive disclosures referred to it by the Office of Grant and Research and review and manage the risks associated with the disclosed interests.

When a sponsored project comes to the attention of the committee, the committee will review the financial interests it deems related to the project or agreement and determine whether one or more investigators have a Financial Conflict of Interest; that is, whether their interests could directly and significantly affect the design, conduct, or reporting of the research. If a Financial Conflict of Interest exists, the committee may:

1. Require some specific type of administrative oversight or Management, or

2. Recommend the withdrawal of the proposal or suspension of the project

The Office of the Vice Chancellor will report financial conflicts of interest or non-compliance to funders in accordance with funder regulations. If the funding for the Research is made available from a prime awardee, such reports shall be made to the prime awardee prior to the expenditure of any funds and within 60 days of any subsequently identified financial conflict of interest such that the prime awardee may fulfil their reporting obligations to the funder.

## 5.0 MANAGING CONFLICT OF INTEREST

- 5.1** As stated in section 4, it is the ongoing duty and responsibility of every individual to identify and declare, by informing the Appropriate Person, any real or perceived conflict of interest as soon as they become aware of it.
- 5.2** Any disclosure made should be followed up by conflict evaluation and conflict management if appropriate. Once all the facts regarding the activity in question have been gathered and examined, a decision should be made as soon as is reasonably practicable, what action, if any, needs to be taken and whether the individual's activities need to be restricted.
- 5.3** In evaluating the disclosure, the Appropriate Person may seek help and advice from the Director of Office of Grant and Research, and colleagues in the relevant professional areas, such as the Finance Department, Human Resources, Legal Services, Internal Audit and relevant academic department.
- 5.4** In majority of circumstances, a full prior disclosure of a potential conflict of interest, and a written record of that disclosure, will be enough to manage the conflict situation. This is because the Appropriate Person may find out that a proposed or ongoing research or consultancy agreement and the employee's personal interests show no conflict or apparent conflict and are acceptable without further review.
- 5.5** If, however, after evaluating the disclosure, it is decided that the conflict of interest is unacceptable, a Conflict Management Plan should be agreed to actively manage the conflict, or if possible, to avoid it. The approach adopted should be documented, signed by both the individual concerned and the Appropriate

Person, and copies provided to the relevant parties (including Human Resources to be noted on the individual's personnel file).

**5.6** The steps agreed to manage or avoid conflict of interest should:

- *Specify the person, department or faculty which will be informed of the specific interest either by the individual concerned, or by the Appropriate Person.*
- *Specify any positions which the individual making the disclosure may not occupy.*
- *Specify any activities, including discussions, negotiations and decisions, in which the staff member making the disclosure may not participate.*
- *Be designed to protect the integrity and the reputation of the individual and the University.*

**5.7** Depending on the seriousness of the conflict, one or more of the following management strategies could be agreed:

- *Standing aside from any involvement in a particular project – when no alternative can be agreed upon, this will be the solution by default, provided that it does not go beyond the scope of the individual's contractual obligations.*
- *Not taking part in meetings, discussions and decision making in relation to certain matters.*
- *Appointment of an alternative member of staff to make decisions on specific matters.*
- *Modifying the project/research plan.*
- *Monitoring of the project/research by independent external reviewers.*
- *Resolving not to act as a person's Supervisor or Line Manager.*
- *Disclosure of all pertinent information to other relevant individuals/Publishing a notice of interest/Declaring an interest to a funder, sponsor or third party.*

- *Divesting or placing in trust certain financial interests.*
- *Severance of relationships that create actual or potential conflicts – termination of involvement by others (e.g. a relative or friend) in the activity.*
- *Any other appropriate conflict management approach.*

**5.8** It is the responsibility of the individual affected to comply with the agreed course of action.

**5.9** If the member of staff does not agree with the decision made by the Appropriate Person regarding how the conflict should be avoided or managed, they have the right to appeal such decision by raising the matter through the University's Grievance Procedures.

## 6.0 APPEALS

Any University employee who is not satisfied with a decision relating to him or her made by a Responsible Person under this policy may appeal the decision within fourteen (14) days of receiving written notice of the decision. The University employee shall submit a written statement outlining the grounds of appeal and the reasons thereof, together with any relevant documentation, to the Head of the Responsible Person who made the decision.

If the university member reasonably believes that the administrative head to whom the appeal will normally be directed was previously involved in the decision or might otherwise be biased in considering the appeal, the university member may submit the appeal to the administrative head of that person as defined in 4.1.8. If the appeal is of a decision of an ad hoc committee, it shall be made to the Vice Chancellor. The administrative head receiving the appeal shall make a final decision, normally within thirty days, but he or she may extend that time upon giving notice to the appealing university employee if it is desirable to consult with others or consider the matter further before making the decision. An appeal decision shall be in writing and shall be binding on the university member.

## **7.0 COMPLIANCE WITH THE POLICY**

The intent of this policy is to assist the University in the management of conflict of interest situations before they arise or when they become known. The University expects that its members will comply fully with this policy, including all requirements for disclosure. Failure to comply with this Policy constitutes misconduct and may result in disciplinary action in line with the University's policies and procedures.

## 8.0 NON-COMPLIANCE

Non-compliance includes but is not limited to a University employee's failure to disclose a conflict of interest that is determined to be a conflict of interest, or failure by an employee to materially comply with a management plan for a conflict of interest, or providing false, misleading, or incomplete information.

### a) Disciplinary Action

- In the event of an employee's failure to comply with this Policy, the Office of the Vice Chancellor will refer the issue to the Office of Grant and Research or an ad hoc committee who will recommend the appropriate disciplinary action or sanctions to be implemented. The Office of the Vice Chancellor will then make the final decision on the appropriate action. This decision will be described in a written explanation to the investigator, the Office of Grants and Research, the Committee, and, where applicable, the Office of the Vice Chancellor, and will notify the individual of the right to appeal the decision.
- Failure to comply with this Policy renders the Investigator liable to disciplinary action by the University including but not limited to suspension of grant and suspension of ethical approval of studies.
- The Office of the Vice Chancellor may suspend all relevant activities until the matter is resolved or the appropriate disciplinary action has been implemented.
- The University will promptly notify the Awarding Agency of the action taken or to be taken. If the funding for the research is made available from a prime awardee, such notification shall be made promptly to the prime awardee for reporting.

## b) Retrospective Review

In addition, if the Office of the Vice Chancellor determines that a Conflict of Interest was not identified or managed in a timely manner, including but not limited to an employee's failure to disclose a conflict of interest that is determined to be a conflict of interest, or failure by an employee to materially comply with a management plan for a conflict of interest, the relevant Committee will complete a retrospective review of the employee's activities and the research project to determine whether the research conducted during the period of non-compliance was biased in the design, conduct or reporting of the research.

Documentation of the retrospective review shall include the project number, project title, Principal Investigator, name of Investigator with the conflict of interest, name of the entity with which the investigator has the conflict of interest, reason(s) for the retrospective review, detailed methodology used for the retrospective review, and findings and conclusions of the review.

The Office of the Vice Chancellor will update any previously submitted report to the funder or the prime awardee relating to the research, specifying the actions that will be taken to manage the conflict of interest going forward. This retrospective review will be completed in the manner and within the time frame established in funder regulations. If bias is found, the institution will promptly notify the funder and submit a mitigation report in accordance with the funder's regulations. The mitigation report will identify elements documented in the retrospective review, a description of the impact of the bias on the research project and the plan of action to eliminate or mitigate the effect of the bias.

## **9.0 EFFECT ON COLLECTIVE AGREEMENTS**

Nothing in this policy shall be construed as limiting any right of grievance or arbitration that exists under an applicable collective agreement.

## 10.0 TRAINING

Each employee who has research responsibilities must complete training on this Policy, the researcher's responsibilities regarding disclosure and the funder's regulations prior to engaging in externally funded research, and at least every four years thereafter. They must also complete training within a reasonable period of time as determined by the Vice Chancellor in the event that this Policy is substantively amended in a manner that affects the requirements of researchers, if the researcher is new to the institution or if it is determined that the researcher has not complied with this policy or with a management plan related to their activities.

## **11.0 RECORD RETENTION**

The Office of Grants and Research will retain all disclosure forms, conflict management plans, and related documents for a period of three years from the date the final expenditure report is submitted to the funder or to the prime awardee, unless any litigation, claim, financial management review, or audit is started before the expiration of the three-year period. The records shall then be retained until all litigation, claims or audit findings involving the records have been resolved and final action taken.

## **12.0 REGULATORY AUTHORITY**

This policy implements the requirements of ΚΝΥΣΤ. Where there are substantive differences between this policy and the requirements of funders, the requirements of both ΚΝΥΣΤ and the funder will be factored into any resolution of the difference.

## 13.0 ACKNOWLEDGEMENTS

The Kwame Nkrumah University of Science and Technology gratefully acknowledges that the following documents were referred to when preparing this Conflict of Interest Policy:

- Dalhousie University, 2004. Policy on Conflict of Interest.
- Northwestern University, 2018. Policy on Conflict of Interest and Conflict of Commitment.
- University of Canterbury, 2017. Conflict of Interest Policy, Principles and Guidelines.
- University of Edinburgh, 2017. Policy on Conflict of Interest.
- University of Southampton, 2017. Conflicts of Interest Policy.
- University of Vermont, 2014. Conflict of Interest and Conflict of Commitment.

**QUALITY ASSURANCE AND PLANNING UNIT**

Vice-Chancellor's Office  
Kwame Nkrumah University of Science and Technology  
KNUST, Kumasi  
PMB UPO, Kumasi-Ghana  
Tel: +233 322060319  
Email: [info.qapu@knust.edu.gh](mailto:info.qapu@knust.edu.gh)

ISBN: 978-9988-2-8487-9

