

Some of the Rules on Conflicts of Interest of the University of Tsukuba to Be Amended as of **April 1, 2022**.

Background: The government's new policy requests each university and research institution to foster research integrity.

- Recently undue foreign influence has raised concerns about conflicts of interest or commitments, or technology leakage.
- Major countries including the U.S. have been taking countermeasures while emphasizing international research cooperation and respecting the initiatives of universities and other research institutions.
- It is also vital for Japan to build a research environment that is internationally credible in order to handle these risks and promote necessary international cooperation and exchange.



The following government policy was decided by the Council for Integrated Innovation Strategy on April 27, 2021 (Note 1) :

- (1) Researchers to appropriately disclose information on their own
- (2) Strengthen the management of organizations such as universities and research institutions
 - Dissemination and communication regarding the development of related regulations and systems
(→ to be followed up by the competent authority in the fiscal year 2022)
- (3) A public funding agency to verify an application when it is filed
 - Guidelines such as those for competitive research funds were revised (on December 17, 2021) (Note 2)
 - Require that applicants commit themselves to submit information such as that on support from external sources including overseas sources or side jobs and to appropriately report to the organizations where they work (Note 3)
 - Clarify the importance of developing regulations concerning conflicts of interest and commitments, and as needed check the situation of the organizations where they work

(Note 1) “Policy for ensuring research integrity corresponding to new risks associated with internationalization of and open access to research activities (Decision of the Council for Integrated Innovation Strategy on April 27, 2021)”: In association with the decision on this government policy, request letters have been sent to the president of each organization such as national university corporation by four Director Generals of the Ministry of Education, Culture, Sports, Science and Technology (MEXT). “Ensuring research integrity at universities and public research institutions (request)” by the Director General of Science and Technology Policy Bureau, the Director General of Higher Education Bureau, the Director General of Research Promotion Bureau, and the Director General of Research and Development Bureau of MEXT, Notice No. 70 of MEXT, Science and Technology Policy Bureau on April 27, 2021

(Note 2) Guidelines for proper execution of competitive research expenses (revised on December 17, 2021)

(Note 3) In the guidelines revised in December 2021 as referred to in the above (Note 2), it is stated as follows (the summary):

- When filing an application for research funds to a public funding agency, **the principal researcher and other researchers must include information on the status of application and acceptance of other competitive research expenses or other research expenses, and all organizations where they currently work and their job titles, in an application document and/or a common system.** If there is a false statement in the application document and/or common system, the application may be rejected, the acceptance of the application may be canceled, or reduced funds may be allocated.
- When filing an application for research funds to a public funding agency, **the principal researcher and other researchers must commit themselves to appropriately report, under the relevant regulations, to the organizations where they work on information required for ensuring transparency related to all research activities they are involved in, including information on support such as the provision of contributions and facilities and equipment other than funds,** in addition to the above information on research funds and their organizations and job titles. If it is revealed that an inappropriate report has been submitted in violation of such commitment, the application may be rejected, the acceptance of the application may be canceled, or reduced funds may be allocated.

Outline of the revision of the Rules on Conflicts of Interest of the University of Tsukuba

1. Occasional reports in addition to regular reports	Although reports have been required to be submitted only once a year, a report will be required to be submitted each time a case occurs (including amended reports).
2. Scope of entities such as companies subject to reporting	The scope of entities such as companies subject to reporting is expanded to all such entities , removing the condition that an entity has a contractual relationship with the University, other than stock holding etc.
3. Scope of individual financial interests subject to reporting	In addition to side business fee, licensing fee, salary and stock holdings etc., acceptance of money, facilities, equipment devices etc. or services from entities such as companies, which is related to the job or may damage the integrity of the job, if it is not under the University's control, will be subject to reporting irrespective of the amount. (Note 4)
4. Eligibility required to be reported with respect to individuals other than employees or officers themselves	Although individuals subject to reporting other than employees or officers themselves have been "their relatives within the second degree of kinship who share livelihood with them," it is revised to be "their relatives within the first degree of kinship who share livelihood with them" and such reporting requirement will apply only in the case of stock holding etc.
5. Effective date	The Rules shall come into effect as of April 1, 2022.

(Note 4) "Acceptance of money, facilities, equipment devices etc. or services from entities such as companies, which is related to the job or may damage the integrity of the job, if it is not under the University's control"

For example, when a faculty member receives research funds provided by a nongovernment research support organization, the University will handle those funds by having the faculty member contribute them to the President to enable the University to deal with their accounts; therefore, such funds are under the University's control. In this manner, acceptance of money, facilities, equipment devices and services from entities such as companies, which is not under the University's control and is related to the job or may damage the integrity of the job is a rare case in fact, and it is considered that most of funds are under the University's control.

When a faculty member gives a lecture or writes a manuscript at the request of an entity such as a company, a reward therefor will be under the University's control if the faculty member has submitted a side job notice to the University, and the reward should be reported as a "side business." If a faculty member receives a reward for writing a manuscript as a side business independently outside the University, it does not fall into the category of the situation "related to your job". And moreover, such a case has been widely practiced in each field for many years, and consequently it does not fall under the category of the situation "that may damage the integrity of duties". So, it is not subject to reporting obligations.

* **Specific cases of those which are related to the job or may damage the integrity of the job**

- Those which are related to the job duties: A faculty member might receive funds or items such as equipment provided by an organization such as an agency related to the foreign government for research activities carried out at the University. In addition, the cases where a faculty member uses research equipment provided by an entity such as a company in the member's laboratory while forgetting to go through contribution or other procedures may also be included.
- Those which may damage the integrity of the job: It may be the cases where a faculty member takes any office in an organization such as an agency related to the foreign government or a foreign university and receives a salary (it may be indirectly related to job duties, but such relationship will be denied legally) or receives expensive gifts from such organizations, and thereby it is concerned that technology may be leaked to a third-party government agency and the University's international credibility is likely to be impaired.

Date of modification of the disclosure form for conflicts of interest and start time of operation of the self-declaration system for conflicts of interest

1. For those to be declared by the end of May 2022 (those having occurred in FY2021), use the current disclosure form for conflicts of interest.
2. Occasional reports will be required to be submitted on and after April 1, 2022. However, **the e-Report system corresponding to the revision of the Rules on Conflicts of Interest will start operating on October 1, 2022**, and accordingly, during the period from April 1, 2022 to September 30, 2022, download the disclosure form from the website of the Office of Conflict of Interest and Security Export Control and submit the completed form by email (via affiliated administrative office).

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