

## Conduct of Conflict of Interest management

Waseda University conducts Conflict of Interest management on a regular basis (e.g. once a year) depending on the type of public research funds, as follows:

### 1. Health and Labour Sciences Research Grants and AMED (Japan Agency for Medical Research and Development)

**Timing:** Between December and May (tentative)

**Subjects:** Research representatives and research collaborators who apply for Health and Labour Sciences Research Grants and AMED for the following year (including ongoing projects starting from the previous year or before)

**Matters to be reported:** Financial interest relations with research related corporations/organizations regarding research projects funded by Health and Labour Sciences Research Grants and AMED, such as 1) Industry-Academic-Government Cooperation activities receiving two million yen or more in total per year from one interested party, 2) salary, dividends and rewards of one million yen or more, and 3) ownership of shares, and cases where there are no financial interest relations (see Note 1).

**Note 1:** In the case of Health and Labour Sciences Research Grants and AMED, the submission of a "Conflict of Interest report" is an essential requirement for application for the grants, so reporting is required even though there is no financial interest relation.

**Note 2:** In the case where the interested party, as a research related corporation, is a university-launched venture corporation, reporting is required regardless of the amount of money or number of shares held.

**Note 3:** For the details, please see Clause 12 of "Regulations for Conflict of Interest Management Regarding Public Research Funds" at the Research Promotion Division website: (<http://www.waseda.jp/inst/ore/en/>)

### 2. Public research funds (except Health and Labour Sciences Research Grants and AMED)

**Timing of submission:** Between July and October (tentative)

**Subject:** Research representatives and research collaborators who are receiving public research funds (except Health and Labour Sciences Research Grants) in the relevant year

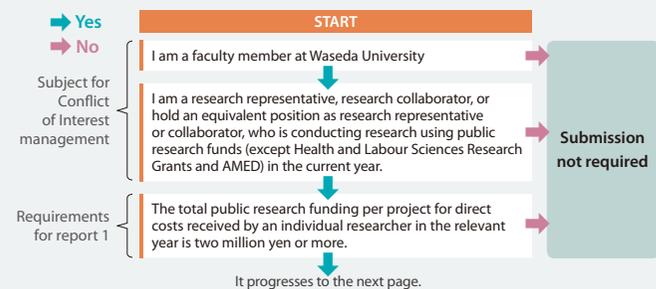
**Matters to be reported:** Financial interest relations with research related corporations/organizations regarding public research funds (except Health and Labour Sciences Research Grants and AMED)

#### <Financial interest relations which must be reported>

It conforms to reporting requirements of the Health Labor Science Research Grants, but the standard amount, the number of shares held and other requirements may be relaxed.

### Judgment flow chart for the submission of Conflict of Interest reports related to public research funds (except Health and Labour Sciences Research Grants and AMED)

(Reference: In the chart below, the amount of money requirement for reporting is a 2018 example. For the details related to your case, please check the report requirements for the relevant year).



Requirements for report 2

Note 1: Includes the case where spouse or first-degree family members living together with that researcher are funded.

Note 2: The research related scope of corporations/organizations includes their affiliate companies (such as subsidiary companies)

(1) The total amount per year, including research grants, other funds, and the monetary value of personnel, facilities, equipment, and articles, received from one interested corporation/organization related to research activities supported by public research funds is three million yen or more.  
 In the case of a university-launched venture company, reporting is required for one million yen or more.

(2) The total amount of income (including salary, dividends, consultant fees, rewards or compensation for other services) received from a research related corporation/organization involved in research using public research funds is two million yen or more.  
 In the case of a university-launched venture company, reporting is required for one million yen or more.

(3) I hold shares in a research related corporation/organization involved in research using public research funds within the following conditions:  
 1) I hold one or more pre-listed shares.  
 2) I hold one percent or more of issued shares in public offering shares  
 3) I hold one percent or more of shares in private funds of a member company  
 4) I hold share warrant rights

(4) I have received beneficiary rights (loans/guarantees) from research related corporations/organizations involved in research using public research funds.

There is no need to submit the conflict of interest report regarding public research funds (except Health and Labour Sciences Research Grants and AMED).

The report must be submitted if one of the conditions was met in the past three years, including the current year.

Note: When a researcher offers to carry out self-management of Conflict of Interest by submitting a "Voluntary conduct of Conflict of Interest management report," he/she may not be required to report "financial interest relations" to the committee.

For faculty and staff who are engaged in research activities supported by public research funds

# Conflict of Interest Management Guide

Towards peace of mind in the conduct of Industry-Academic-Government Cooperation ...

## Q & A regarding Conflict of Interest management

### Q1 What is the makeup of the Conflict of Interest management committee?

A1 In order to ensure fairness and objectivity, the composition of the committee is as follows:  
 1) Dean of the related department, and so on 2) full-time faculty members selected from various faculties, 3) faculty and staff with expertise, designated by the president, and 4) external experts

### Q2 What should I do when I am concerned about a situation regarding Conflict of Interest?

A2 You can consult with a Conflict Of Interest prevention advisor (lawyer). First, please contact the committee secretariat, as the secretariat sets up consultations.

### Q3 What does a Conflict of Interest prevention advisor do?

A3 A Conflict of Interest prevention advisor provides consultation for faculty and staff about Conflict of Interest and gives necessary advice and information. The scope of consultation is Conflict of Interest related to research with public research funds. The Conflict of Interest prevention advisor and the committee work cooperatively.

For other Q&As regarding Conflict of Interest and its management, please visit the following website (Waseda University Office of Research Ethics):

<https://www.waseda.jp/inst/ore/en/conflict/>

**Inquiries and consultation:**  
**Waseda University Conflict of Interest Management Committee Secretariat**  
 (within the Research Management Section of the Promotion Division)  
 Email: [riekisouhan@list.waseda.jp](mailto:riekisouhan@list.waseda.jp)  
 Tel: 03-5272-4652 (ext.71-8042)



Waseda University Research Promotion Division  
 Waseda University Conflict of Interest Management Committee

# 1 What is a Conflict of Interest (COI)?

When members of the university faculty or staff establish relationships with outside corporations/organizations (e.g., joint research, commissioned research, or donations) in the course of Industry-Academic-Government Cooperation, sometimes those relationships develop in a manner that involves personal financial interests, such as a member of the faculty or staff assuming a position as executive officer, holding shares, or accepting significant compensation from the involved corporations/organizations.

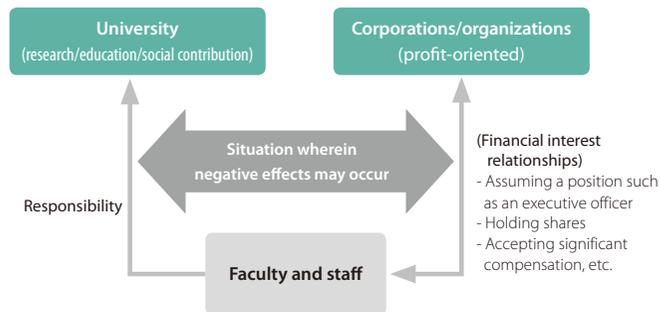
However, the goals and roles of the university are different from those of corporations/organizations, as the university conducts research and offers education with the aim of searching for truth, while corporations/organizations engage in activities for profit. Thus, there could be a situation wherein conflicts arise between the interests of the faculty or staff member in his/her relationship with a corporation/organization, and that member's responsibility to the university.

The situation described above is a "Conflict of Interest" (see Note).

Although collaboration inevitably brings about "Conflicts of Interest," this common phenomenon is not categorically negative. That said, there are legitimate concerns that such situations may have concrete negative effects.

The negative effects of Conflicts of Interest include not only actual instances of harm but also the risk of occurrence thereof, or the appearance of the occurrence thereof from the perspective of third parties.

## Overview



(Note)

The following three situations are collectively referred to as "Conflicts of Interest":

- (i) Individual Conflict of Interest (private interests of the individual vs. his/her responsibility to the university/research/education)
- (ii) Institutional Conflict of Interest (interests of the university vs. the university's social mission)
- (iii) Conflicting duties (responsibility of an individual to perform duties for third parties vs. his/her responsibility to perform duties at the university)

At present, Waseda University is targeting the management of "Individual Conflict of Interest" (item (i) above) that may occur in the course of conduct of publicly funded research by faculty and staff.

For the details about the concept and definition of "Conflicts of Interest," please refer to "Conflicts of Interest working group report" of MEXT Council for Science and Technology, issued in November 2002, available at

[http://www.mext.go.jp/b\\_menu/shingi/gijyutu/gijyutu8/toushin/021102](http://www.mext.go.jp/b_menu/shingi/gijyutu/gijyutu8/toushin/021102) (Japanese only)

Guidelines on the management of Conflict of Interest (COI) in Health Labor Science Research <http://www.mhlw.go.jp/stf/seisakunitsuite/bunya/hokabunya/kenkyujigyou/i-kenkyu/index.html>

# 2 The Need for Conflict of Interest Management

As a part of adapting intellectual achievements to benefit society, universities promote Industry-Academic-Government Cooperation and other activities. Consequently, the possibility of Conflicts of Interest occurring may increase. Since Conflict of Interest may occur routinely in the course of Industry-Academic-Government Corporation activities, control based on concrete samples or criteria is not practical, unlike in the case of legal violations.

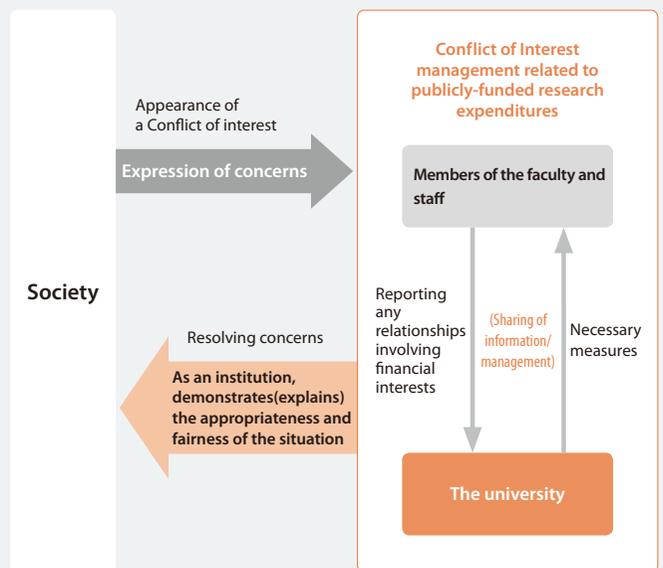
If a university fails to take measures to avoid situations that result in Conflicts of Interest as described above, negative effects may proliferate, causing society to lose confidence in the faculty and staff of the university, thereby actually interfering with the promotion of Industry-Academic-Government Cooperation and other activities. Especially when the negative effects resulting from Conflicts of Interest concern "publicly-funded research," society will hold the university accountable.

To avoid such problems, it is important to conduct organizational management of Conflict of Interest involving faculty and staff so as to prevent negative effects before they happen, and to promote healthy Industry-Academic-Government Cooperation activities so that faculty and staff can engage in such collaborative activities with peace of mind.

Specifically, faculty and staff must first share with the university any information concerning their financial interests in any corporations/organizations related to their research activities. If such information is shared, if later there are suggestions from society of Conflicts of Interest concerning faculty or staff, the university will be in a position to assume its share of the responsibility for explaining the situation to external parties and reduce the accountability of the individual involved.

Regarding Health and Labour Sciences Research and AMED, there is an obligation to report the implementation status of Conflict of Interest management to the Ministry of Health, Labour and Welfare or AMED.

## Overview



# 3 The Conflict of Interest Management System at Waseda

Waseda University has established its "Regulations for Conflict of Interest Management Regarding Public Research Funds" (effective December 4, 2009) as well as a Conflict of Interest Management Committee pursuant to those regulations. Conflict of Interest management is carried out by the Committee.

An overview of the management system is provided below.

## Conflict of Interest Management Committee

### (1) Targets of management

Relationships involving the financial interests of full-time faculty and staff of the University serving as research representatives or research collaborators in publicly-funded research related to corporations/organizations

Relationships of financial interest include those which concern not only the researchers personally but also financial interest relationships involving spouse or first-degree family members living together with those researchers.

### (2) Management method

- (i) Receipt of reports<sup>note</sup> on relationships involving financial interest from the faculty and staff concerned [periodically (once per year) and as need arises (e.g. when there is a change in the description of reportable content / additional adoption)]
- (ii) Confirmation and screening by the Committee based on such reports (including confirmation of report content, advice and inspection)
- (iii) Notice of the results of screening
- (iv) Improvements requested of the concerned faculty and staff if deemed necessary by the Committee as a result of screening (Receipt and screening of written objections regarding the above as well as notification of the results of such deliberation)

Note: Report can be submitted in printed form or via "Course N@vi" on the top page of MyWaseda.

## Appointment of Conflict of Interest Prevention Advisor

A Conflict of Interest Prevention (COI) advisor (lawyer) offers consultations to the faculty and staff, dispensing necessary advice or information accordingly.

If you wish to consult an advisor, please inquire to the Conflict of Interest Management Committee secretariat.

## Overview

