



International Centre of Insect Physiology and Ecology

P. O. Box 30772-00100 Nairobi, Kenya

Tel: +254 20 8632000; Fax: +254 20 8632001

icipe@icipe.org – www.icipe.org

**POLICY GUIDELINES ON THE DISCLOSURE AND MANAGEMENT OF
FINANCIAL CONFLICT OF INTEREST**

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ACRONYMS

AU	African Union
CBID	Capacity Building and Institutional Development
CBOs	community based organisations
FCOI	Financial Conflict of Interest
NGOs	non-governmental organisations
NIH	National Institutes of Health
PASET	Partnerships for Skills in Applied Sciences, Engineering and Technology
PHS	Public Health Services
PI	Principal Investigator
R4D	Research for Development
RSIF	Regional Scholarship and Innovation Fund
SDGs	United Nations Sustainable Development Goals
SFI	Significant Financial Interest
STISA	AU Science, Technology, and Innovation Strategy for Africa

OPERATIONAL DEFINITIONS

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

Financial conflict of interest (FCOI): Significant financial interest that could directly and significantly affect the design, conduct or reporting of a funded research.

Principal Investigator: Also referred to as Investigator or PI, is any person identified as senior/key personnel by *icipe* in the grant application.

Key personnel: Any individual identified within a grant application or progress reports who can directly or materially influence the research, or who are responsible for the design, conduct, and reporting of such research, whether *icipe* is a prime awardee or a sub-awardee.

Pre-Award: Activity prior to official funding of a submitted proposal.

Significant financial interest (SFI): An aggregated income of the Investigator, their spouse and dependent children which exceeds \$5,000 from an entity or interest that reasonably appears to be related to the Investigator's responsibilities at *icipe*.

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1.0 Introduction

Established in 1970, the International Centre of Insect Physiology and Ecology (*icipe*) (www.icipe.org), entered its second 50 years of service in 2020, as Africa's leading and principal insect and arthropod related research institute (Insects for Life – A brief history of *icipe*@50 - <http://www.icipe.org/publications/annual-reports>). The mission of *icipe* is to contribute towards poverty reduction, food security, better health, and environmental protection across the developing world by enhancing the capacity of researchers and communities in insect science and its application.

The Centre has made a difference through its mission by improving the livelihoods of millions of Africans in sustaining growth in Africa from its R4D activities. The mission of *icipe* aligns with the United Nations Sustainable Development Goals (SDGs) 2030 and African Union (AU) Agenda 2063 (<https://au.int/en/agenda2063/overview>) for sustainable and inclusive economic growth and societal transformation to match the needs of the rapidly growing and urbanizing populations. Its scientific research, capacity building and innovation activities are continuously addressing key priorities of the African continent's scientific capacity development highlighted in the AU Science, Technology, and Innovation Strategy for Africa (STISA 2024 - <https://au.int/en/documents/20200625/science-technology-and-innovation-strategy-africa-2024>).

icipe's R4D strategy is defined by the following three key elements:

- (a) A focus on research domains in which insects and related arthropods have critical roles as vectors, pests or are the basis for beneficial uses such as for food, feed, and ecosystem services and value-added products e.g., silk and honey,
- (b) Innovation that can be applied to develop sustainable and safe alternatives to reliance on chemicals, and
- (c) Highly valued R4D through Capacity Building and Institutional Development (CBID).

The Centre operates through an organisational design that incorporates four research health themes – Plant Health, Animal Health, Human Health, and Environmental Health (4Hs),

and an array of partnerships with African and non-African universities and research organisations, non-governmental organisations (NGOs), community-based organisations (CBOs) and the private sector that allows for *icipe's* footprint in a majority of Africa's 55 member states. *icipe* is also managing two important Special Programmes - (i) the BioInnovate Africa Programme, a regional science and innovation-driven programme that supports the conversion and transfer of biobased research ideas, technologies and inventions to the market; and (ii) the Regional Scholarship and Innovation Fund (RSIF) of the Partnerships for Skills in Applied Sciences, Engineering and Technology (PASET) [RSIF-PASET] that aims to contribute towards training of a critical mass of PhD and post-doctoral fellows and support for research and innovation in priority sectors of energy, ICTs, material science, climate change and food security.

1.1 Background

Studies have highlighted the increasing complexity of financial relationships between researchers in health fields and industry or other stakeholders and the possible ramifications of those relationships. A study by the US Institute of Medicine on Conflict of Interest in Medical Research, Education and Practice concluded that: "Physicians and researchers must exercise judgement in complex situations. All stakeholders including the public need to trust that these judgements are not compromised by physicians' or researchers' financial ties to pharmaceutical, medical device and biotechnology companies". [Conflict of Interest in Medical Research, Education, and Practice \(nih.gov\)](#). Ties with private and public sector are common in *icipe's* research activities. Some have produced important benefits particularly through research collaborations that improve individual and public health and wellbeing. At the same time, widespread relationships with private and public sector create risks that individual and institutional financial interests may unduly influence professionals' judgement about the primary interests or goals of the research. Such conflict of interest could threaten the integrity of scientific investigations, the objectivity of the research, and the quality of research information dissemination.

1.2 Purpose of the guidelines

These Financial Conflict of Interest (FCOI) guidelines are expected to promote objectivity in research by establishing standards that provide a reasonable expectation that the design, conduct, and reporting of research performed under various grants or collaborative agreements will be free from bias resulting from Investigator financial conflicts of interest. The guidelines are also expected to ensure *icipe*'s work complies with the standards of managing Financial Conflict of Interest (FCOI) including, managing, reducing, or eliminating and reporting identified conflicts.

1.3 Applicability

These guidelines are applicable to all individuals at *icipe* who are planning to participate in or are participating in research grants and engage in collaborative research activities. This will include the Principal Investigator (Investigator) as well as those qualifying as key personnel at *icipe* or sub-awardee organization or collaborating organization. The requirements will also apply to any other individual identified within a grant application or progress reports who can directly or materially influence the research, or who are responsible for the design, conduct, and reporting of such research, whether *icipe* is a Prime Awardee or a Sub-awardee. Any reference to Principal Investigator or Investigator in this policy guideline shall be construed to include all these individuals referred under this paragraph.

2.0 Roles and responsibilities

This section details the responsibilities of all stakeholders in ensuring compliance to this policy guideline.

2.1 *icipe* Scientific Committee

The *icipe* Director of Research and Partnerships will:

- Ensure that where applicable, individuals listed as PIs or Key personnel, submit a disclosure of financial interest form (**see appendix A**) for filing in the Grants, Partnerships and Projects Office, within the Director General's Office.

- Working with *icipe's* Scientific Committee, determine whether a Principal Investigator's significant financial interest could affect the research or is in an entity whose financial interest could affect the research.
- Take action to manage identified financial conflict of interest, including reporting all FCOI to the *icipe* Senior Management Committee, who will issue recommendations on its management.
- Report any non-compliance to the *icipe* Senior Management Committee and manage the established enforcement mechanisms to ensure Investigators' compliance.
- Ensure that any sub recipients of research grant funds abide by *icipe's* FCOI policy guideline.

2.2 Grants, Partnerships and Projects Manager

- Ensure that this policy guideline is up to date by incorporating all updates from the donor and other government agencies.
- Ensure that the policy guideline is enforced within *icipe* and any sub recipient organisations.
- Ensure that this policy guideline is available on the *icipe* website.
- Ensure that all PIs are aware of the policy guideline and their responsibilities to meet compliance requirements.
- Ensure that all PIs/key personnel undertake training regarding the FCOI regulations available at funders' websites for example [Financial Conflict of Interest | grants.nih.gov](https://www.fda.gov/oc/financial-conflict-of-interest)
- Receive and review disclosures of significant financial interests from each Investigator/key personnel who is/are planning to participate in funded research or other funded activities.
- Ensure that all significant financial interest (SFI) disclosures are up to date.
- Provide initial and ongoing FCOI reports to the funding agency as required.
- Monitor PI or other staff's compliance with *icipe's* Senior Management Committee recommendations.

2.3 PIs/Key Personnel

- Undertake training regarding FCOI regulations and where relevant, obtain certification for the same. A copy of the certificate should be submitted to the Grants, Partnerships and Projects Manager.
- Disclose their significant financial interests including those of their spouse and dependent children prior to engaging in a funded research grant on employment at contract renewal or every three years, whichever occurs earlier. Additional disclosure may be required when;
 1. This policy guideline is revised in a way that affects the requirements of investigators and other significant implementers.
 2. An investigator or other key personnel is new to *icipe*.
 3. An investigator or other key personnel renews their employment contract with *icipe*.
 4. An investigator or other key personnel is not in compliance with this policy guideline.

3.0 Disclosure of significant financial interest

Prior to signing of the grant award or sub-award contract, the *icipe* Grants, Partnerships and Projects Manager may, in addition to the routine disclosures noted under paragraph 2.3 above, request from the PI and all the designated key personnel on a given proposal to complete the disclosure of financial interest form (**see appendix A**) and disclose any financial interests that may apply with respect to the pending award. This will be necessary where there is a specific donor requirements or where additional information calls for disclosure. The key personnel will be expected to disclose any income or anything of monetary value received by them, their spouse and dependent children that could compromise the research in some way. These may include but may not be limited to the following:

- Income from a publicly traded entity that reasonably appears related to the PI's or key personnel's responsibilities at *icipe*.
- Income from a non-publicly traded entity that reasonably appears related to the PI' or key personnel's responsibilities at *icipe*.

- Income from intellectual property rights and interests from an entity related to the PI's institutional responsibilities.
- Reimbursed or sponsored travel related to the PI's responsibilities at *icipe*. The information provided will include the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration.
- Income from institutions of higher education and Governments.

All new PIs and key personnel assigned a role on an on-going research project, education or practice will be required to disclose any financial interests as soon as they are appointed. Any disclosed interests will be reviewed and addressed within sixty working days.

3.1 Exceptions to disclosure

PI and Key personnel are not required to declare the following:

- Salaries, royalties or other remuneration including shares in Intellectual property rights paid by *icipe* to the Investigator or other key personnel if that individual is currently employed by or otherwise appointed by *icipe*.
- Income from investment vehicles such as mutual funds and retirement accounts as long as the Investigator or other key personnel does not directly control investment decisions made from these vehicles.

The forms will be received and reviewed by the Grants, Partnerships and Projects Office before being forwarded to the *icipe* Senior Management Committee. The Committee will investigate the disclosed interests with an aim of establishing whether they will significantly affect the design, conduct or reporting of the project to which the Investigator or other key personnel is attached. Investigations will include an interview with the key personnel as well as other independent verification channels.

4.0 Management of financial conflicts of interest

4.1 Management of identified conflicts of interest

In case a financial conflict of interest is disclosed, the *icipe* Senior Management Committee will consider the interest and recommend that the conflict is managed in one or more of the following ways:

- Change of personnel or personnel responsibilities or the PI be stripped of his/her research responsibility by *icipe* for the period of the grant or longer.
- Modification of the research or project plan.
- Suspension of all research activities in which the Investigator/key personnel is involved in relation to the SFI.
- Ensure that the Investigator/key personnel publicly discloses the financial conflict of interest while presenting or publishing the project findings.
- Appointment of an independent monitor capable of taking measures to protect the design, conduct and reporting of the research or other project against bias resulting from the financial conflict of interest.

The recommended action and all the committee meeting discussions will be written and appropriately filed.

4.2 Management of undisclosed conflicts of interest

In the event that it comes to light of a significant conflict of interest that was not disclosed by an Investigator/key personnel, the matter will be referred by the supervisor to the *icipe's* Science Committee. The committee will within ninety working days review the significant financial interest and determine whether it is related to a given grant award, research/education or practice or project and whether a financial conflict of interest exists and make a report to the Senior Management Committee. If a financial conflict of interest is identified. The Committee will:

- Suspend / strip the Investigator of his/her research responsibility for all research activities in which the Investigator/key personnel is involved in relation to the SFI.
- Ensure that any bias created by the undisclosed conflict is managed appropriately.
- Modify the study design where applicable.

- Stop the Investigator/key personnel from participating in any research or other donor funded activity for a certain period following this incident.
- Subject the Investigator/key personnel to disciplinary action in line with *icipe* policies.

The Science Committee will also undertake a retrospective review of the Investigator's or key personnel activities and the project to determine whether any of the research or other activities performed during that time were biased in design, conduct or reporting will be carried out within six months from the date of notification. The retrospective review will be documented, and the documentation will include the following:

- Minutes of the meetings of *icipe* Science Committee and those of the *icipe* Senior Management Committee held to discuss the SFI.
- Project number, title & the PI(s)' contact.
- Name of the Investigator(s)/key personnel with the FCOI.
- Name of the entity with which the Investigator/key personnel has a FCOI.
- Reasons for the retrospective review.
- Detailed methodology used for the retrospective review.
- Findings of the review.
- Conclusions of the review.

4.3 Compliance to *icipe* Senior Management Committee recommendations

The Director General with input from the *icipe* Senior Management Committee will make recommendations regarding a financial conflict of interest and ensure that the Investigators/key personnel in question comply with the actions set out in the report. The Director General will take appropriate action where there is any non-compliance to the actions requested of the PI.

5.0 Reporting of SFIs

5.1 Reporting disclosed financial interests

5.1.1. Publishing of information on publicly accessible website

The Grants, Partnerships and Projects Manager shall publish FCOI information on the *icipe* website. Published information will include: the Investigator's name, title & role in

the research or education or practice project, the name of the entity within which the SFI is held, the approximate dollar value of the SFI or a statement that the dollar value cannot be readily determined through reference to prices or other reasonable measures of fair market value. The information provided on the website will be updated annually and within sixty days of receipt of a disclosure of an SFI.

5.1.2 Reporting to the Awarding Agency

The Grants, Partnerships and Projects Manager will maintain a register of FCOI for all PIs. Each quarter, or as required by the grant contract, s/he will provide a FCOI report regarding all current PIs or key personnel FCOI and significant financial interest to funders and all other relevant stakeholders. In case an identified FCOI is extinguished prior to expenditure of grant funds, *icipe* will not submit a FCOI report on such FCOI. The Grants, Partnerships and Projects Manager will also prepare an annual update detailing the status of the FCOI and any changes in their management plan.

5.1.3 Reporting to the *icipe* Executive Board

The Grants, Partnerships and Projects Manager will provide a half-yearly report regarding all current PIs or key personnel FCOI and all financial interest recorded, to the Executive Board of the Governing Council of the Centre.

5.2 Reporting undisclosed financial interests

The Grants, Partnerships and Projects Manager will submit a mitigation report to the awarding agency following a retrospective review of a non-disclosed SFI. The information provided will enable the awarding agency to understand the nature and extent of the conflict and to assess the appropriateness of *icipe's* management plan. The information provided will include the following:

- Minutes of the *icipe* Senior Management Committee meetings held in relation to the FCOI.
- Project number, PI contact & name of the Investigator/key personnel with a conflict.
- Name of the entity with which the Investigator/key personnel has a conflict.
- Nature of the financial interest.

- Value of the financial interest.
- A description of how the FCOI relates to the funded research project.
- A description of *icipe* Senior Management Committee recommendation.
- Status of implementation of recommendations.

6.0 Record keeping

The Grants, Partnerships and Projects Manager will maintain files of all records relating to all key personnel disclosures of financial interests. In addition to this, all minutes of *icipe* meetings related to reviewing and management of SFI will be filed and stored in the Grants, Partnerships and Projects Office. Files will be maintained in line with retention periods for grants and subgrants records as set out in the Document Retention Policy (currently 20 years after the end of grant and subgrant period).

7.0 Confidentiality

All disclosure forms, conflict management plans, sanction plans, reports and any other related information will be treated as confidential and will be handled in line with the Centre's Data Protection Policy. *icipe* may however be contractually and legally required to make such information available to funding agencies and legal authorities. In such situations, this information will be provided after establishing from the legal unit and/or legal advisers that the request and disclosure is legitimate.

8.0 Policy Amendments

The *icipe* Senior Management Committee, will periodically review and update this policy guideline taking into consideration changes in the research environment and awarding agency regulations.

9.0. Effectiveness

This Policy guideline will become effective immediately upon approval and remain in effect until it is modified, revoked or superseded.

REFERENCES

1. Federal Register Vol.76 No.165, 42CFR PART 50 and 45CFR Part 94.
2. Financial Conflict of Interest Presentation with Case Studies (06/26/2012) - (PowerPoint - 13.4 MB) - These slides provide an overview of the Federal FCOI regulation provided at 42 CFR Part 50, Subpart F Link to External Site on Promoting Objectivity in Research that was presented at the NIH Regional Seminar in Washington, DC on June 22, 2012.
3. Bernard Lo and Marilyn J. Field. *(Eds.) (2009)*. Institute of Medicine, Committee on Conflict of Interest in Medical Research, Education, and Practice. Washington, DC: National Academies Press, 2009. 440 pp. ISBN: 978-0-309-13188-9

Appendix A

INTERNATIONAL CENTRE OF INSECT PHYSIOLOGY AND ECOLOGY	
DISCLOSURE OF FINANCIAL INTEREST FORM	
Date	
Investigator's or key personnel's name	
PIs Title	
Proposal Number	
Proposal Title	
Type of Financial Interest	
Name of entity(ies) with which the financial interest exists	
If travel, please state the purpose of the trip, the identity of the sponsor/organizer, the destination and the duration.	
Estimated monetary value of financial interest (value stated should be an aggregate value including where applicable the income of one's spouse and dependent children)	
Review to determine if a significant financial interest (SFI) exists and if this could affect the research work and results.	
Preliminary review by the: Grants Partnership and Projects Manager	
Reviewed by: Director of Research and Partnerships	
Signature:	Title:
Print Name:	Date:
Review by the <i>icipe</i> Scientific Committee (to be completed by the Director of Research and Partnerships)	
Signature:	Title:
Print Name:	Date:
Recommendation by the <i>icipe</i> Senior Management Committee (to be completed by the Director of Research and Partnership)	
Signature:	Title:
Print Name:	Date: