## RESPONSIBILITY FOR SUBMISSION OF RESEARCH APPLICATIONS TO EXTERNAL FUNDERS

- 9.1 Responsibilities in relation to research applications
- 9.1.1 The University supports and encourages its staff to seek external funding for their research activities and accepts funding for research from a wide and diverse portfolio of sources, in accordance with University Financial Regulations and Ethics Policy. All applications and proposals made, and contracts and awards accepted relating to external research funding, are done so on behalf of and in the name of the University, in accordance with the University's Financial Memoranda and Project Approval (PA) process (see FIN25 Project Approval and Submission Procedures and Guidelines).
- 9.1.2 It is the responsibility of the UWE Bristol Project Manager (the senior person responsible for the project, normally the Principal Investigator), to ensure that, in relation to any application, the University's proposal approval process is engaged with adequately and completed in a timely way. It is also the responsibility of an application's Principal Investigator to ensure that the proposal is of an adequate quality and that the research proposed would meet legal, regulatory and ethical standards.
- 9.1.3 Special consideration should be given and advice sought from the Research Governance and Ethics Team as appropriate, for research proposals where:
  - the University should act as Sponsor for research under the Department of Health Research Governance Framework;
  - the research is a clinical trial, including trials of interventions (see <u>guidance on</u> when clinical trial authorisation is needed);
  - the research involves the investigation of a medical device (see <u>guidance on clinical investigation for a medical device</u>);
  - the research involves the use of human tissue;
  - the research involves vulnerable groups including children, offenders and victims, individuals who may lack capacity under the Mental Capacity Act, or research that may have the potential to contribute to the radicalisation of vulnerable individuals;
  - the research involves animals or animal by-products;
  - the research has a security sensitive dimension, involves security sensitive material and/or may have dual use implications;
  - involves significant international dimensions with research governance implications.

Advice is also available to staff researchers who are drafting research applications via the University's research support teams in RBI, for example in relation to funders'

- requirements, ethical, legal and regulatory aspects, and contractual and intellectual property issues.
- 9.2 Responsibilities in relation to decisions about acceptable sources of funding
- 9.2.1 The University does not accept research funding from the tobacco industry.
- 9.2.2 There may be circumstances where ethical issues can arise when considering whether to apply for, or accept, funding for research from particular sources. It is important that the interests of staff and students and the interests and the reputation of the University as a whole are safeguarded when seeking and accepting external funding (see <a href="FIN25 Project Approval and Submission Procedures and Guidelines">FIN25 Project Approval and Submission Procedures and Guidelines</a>). Researchers should be aware of this issue, and each time an application for funding is to be made (or funding is offered), especially relating to a funder where there has been no previous engagement, due diligence must be conducted to consider ethical, legal and national security implications. It is, however, recognised that such decisions can be complex and difficult for individual researchers to make, and, as such, researchers should approach the Research Governance Manager or the RBI pre-award Hub team for early advice.

Guidance on collaborations with partners outside the UK can be found in the <u>Trusted</u> Research Guidance for Academia, but there are other areas of potential concern that must also be considered. Whilst it is outside the scope of this Code to provide an exhaustive list of what may or may not be acceptable sources of funding, the following circumstances would cause concern and further advice should be sought from the Research Governance Manager. Situations in which:

- the conduct of research may, due to the source of the funding or engagement with the funder in relation to the research, harm or place at undue risk members of the public, participants or staff
- ii) there may be legal constraints on what engagement with a funder is allowed, such as individuals, organisations or nations being sanctioned for all or some activities (including the need to comply with Export Controls legislation)
- iii) the practices of a potential funder, or their motives in commissioning the research, may conflict with the values, mission, aims and objectives of the University
- iv) the ethical and political implications of undertaking research or accepting research funding from a particular source could result in negative publicity and/or may seriously damage the reputation of the University
- v) a third party is involved, and the original source of the funding is unknown or cannot be clearly identified
- vi) a funding organisation wishes to place inappropriate restrictions on publication and exploitation of research

- vii) a funding organisation is attempting to exert pressure to suppress or alter the results of the research which do not further, or may damage, its interests, commercial or otherwise
- viii) a member of staff or close associate may have an interest in a funding organisation
- ix) accepting funds from one source may compromise the ability of the University to apply for or accept funds from another source
- x) the funder is an overseas government, the collaboration involves relevant close links with other nations, organisations, or individuals which may potentially be of concern, especially, but not solely, where the research could potentially be dual use.