

## **Policy statement and procedures for the acceptance of external funding and collaboration with organisations and individuals.**

### **Introduction**

- I. The College regularly enters into a wide variety of arrangements with organisations and individuals that cover a broad spectrum of activities, and in all such dealings the College's good name and academic integrity must be maintained and protected. This policy addresses the issues of reputational risk that may attach to such arrangements.
- II. This policy applies to all external funding and collaborations, such as: research (including participation in research consortia), consultancy carried out in the name of the College, fee-for-service work, student support, funded posts, donations, sponsorship, in-kind support such as the provision of material or equipment and Material Transfer Agreements (MTAs). Where applicable, this policy supplements College's [Policy for the Acceptance of Donations](#).
- III. Faculties, Schools, Departments/Divisions may supplement this College policy statement with their own local policies or guidelines as appropriate or necessary, but should be careful to ensure that they do not contradict or conflict with this policy statement, the [Policy for the Acceptance of Donations](#) or any other applicable policies and procedures.

### **Policy**

1. Faculties, Schools/Departments/Divisions (as appropriate) and individual researchers should not seek or accept funding or in-kind support (e.g. equipment or materials) from organisations or individuals, or enter into collaborations with them, where the nature of the activity or the association with the organisation or individual may bring the name and integrity of the College into disrepute. External funding and collaboration arrangements should comply with all applicable College policies and procedures, such as the [Financial Procedures](#), the [Financial Regulations](#), the [Anti-Corruption Policy](#) or the Conflicts of Interest Policy, where these issues are addressed at greater length and in context.
2. Researchers should also bear in mind that the College is subject to the *Freedom of Information Act 2000*, under which it has an obligation to make certain public disclosures regarding such funding or collaborations.
3. Notwithstanding (4) below, the independence and academic integrity of the conduct of an activity and its findings must not be compromised and the College must always be able to protect its reputation in the way that any outputs can be disseminated, presented and used as well as in the way that both its and its researchers' names can be used. The College would not allow its name to be used in advertising or endorsing products that have been created as a result of work carried out in its laboratories or by its researchers. Where the College agrees that project reports may be used publicly by a collaborator or funder, or where those reports provide the basis for a policy document, the College must nevertheless retain control over how names and logos are used so as to protect reputations, even where moral rights may have been waived. Therefore, in order to prevent academic findings or other outputs being misrepresented or presented in a way that may mislead and/or damage the College's reputation or integrity, the College must have the right to have its and its researchers' names removed from the document and to not be associated with it.

4. There can be no indefinite restriction on the freedom to publish the findings of any externally-funded research or research collaborations, and the terms under which such activities are carried out have to be consistent with the dissemination requirements imposed on the College under the *Charities Act 2011* and the related guidance issued by the Charity Commission and by Research England in its capacity as the principal regulator of English HEIs. It should be noted that such restrictions do not apply to consultancy or fee-for service contracts, but researchers may nevertheless wish to be able to publish some or all of their findings in an academically meaningful way; such matters should be addressed in the contract supporting the work.
5. Faculties, Schools/Departments/Divisions and individual researchers should be sensitive to the College's key relationships with major research sponsors, some of which have policies stating that they will not fund research in universities that accept funding from certain sources (e.g. the tobacco industry).
6. Faculties, Schools/Departments/Divisions and individual researchers should recognise that some sources of support or collaborations may be politically sensitive and that such activities may also have to comply with national and international requirements, such as UK export controls (which apply to the export of project deliverables / findings, whether supplied physically, electronically or orally), or trade sanctions on activity in, or supported from, particular countries or by organisations and individuals with links to those countries.
7. All external support and collaborations must comply with the College's financial policies and procedures including, without limitation, those on the adequacy of the funding to support the work (including Full Economic Costing), ethical approval, the formal authorisation of the activity by the Faculty, School or Department/Division, the protection of the College's name, conflicts of interest and acceptable contractual terms. The scope of the proposed activity must also fall within the College's insurance, which, for example, excludes cover for certain kinds of activity, requires UK Treasury approval for work in areas where trade sanctions apply and sets limits on the cover provided in certain situations. Further information on the College's insurance should be sought from the [Finance Directorate](#). Information regarding trade sanctions and export controls can be found on the [RMID webpages](#). More detailed legal guidance on export controls for the university sector, the UK Government's ATAS student vetting scheme and a toolkit are available on the Project Alpha webpages; this guidance has been drafted by the Association of University Legal Practitioners and Project Alpha from King's, in partnership with the Export Control Organisation and the Foreign and Commonwealth Office.
8. Faculties, Schools/Departments/Divisions and individual researchers should note that collaborations and funding arrangements that also involve any of the College's KHP NHS Foundation Trust partners must also comply with the relevant Trust's own policies relating to the proposed activity.
9. Where a researcher becomes aware of a contentious or sensitive aspect to a particular relationship after it has been put in place, they should promptly raise the matter with their Executive Dean or Head of Schools/Department/Division so that the matter can be escalated within the College to the appropriate level in order to assess the situation and determine what course of action should be pursued.

## **Associated Procedures**

The decision as to whether to accept funding from a particular source or enter into a relationship with an organisation or individual is one which, in normal circumstances, should be taken locally,

with individual researchers exercising their own judgement in the context of this policy statement, other relevant College policy and any local guidelines. Advice may also be sought from senior members of the Research Management and Innovation Directorate or the Fundraising and Supporter Development Office (as appropriate) responsible for the activity in question. Individual researchers have a responsibility to bring any proposed collaborations that they believe may reasonably give cause for concern under this policy statement to the attention of their Executive Dean or Head of School/Department/Division without undue delay, so that the circumstances can be reviewed and appropriate action taken.

Nevertheless, Faculties, Schools and Divisions have a responsibility to endeavour to ensure that applications are not submitted to, funds knowingly received from, or collaborations entered into with, dubious or questionable sources by having in place suitably robust procedures for the scrutiny and sanction of all such activity. Where formal approval and acceptance procedures already exist for certain kinds of activity, Faculties, Schools and Divisions should configure their own procedures for compliance with this policy statement around those procedures.

The procedures for the approval and acceptance of external funding and collaboration are:-

<u>Category of Activity</u>	<u>Procedure</u>
Funded research (including consortium-based projects), College consultancy and fee-for-service work	The formal application, approval and acceptance processes are set out in the College's Financial Procedures. Executive Deans or Heads of School/Division should ensure that all projects submitted to them for approval comply with this policy statement prior to giving their approval.
Funded posts and sponsorship	Some funded posts are supported by research sponsors through their normal research grant mechanisms; the application, approval and acceptance procedures for such posts are therefore the same as for funded research.
	All other applications require prior approval from the Fundraising and Supporter Development Office and Executive Deans, School or Division. All such applications should be discussed with both the Fundraising and Supporter Development Office and Executive Deans or Heads of School/Division at the earliest possible opportunity. Signature and acceptance on behalf of the College may only be made by the appropriate authorised College signatory, as agreed with the Fundraising and Supporter Development Office.
Donations & philanthropic gifts	The approval and acceptance processes are as set out in the College's <a href="#"><u>Policy for the Acceptance of Donations</u></a> . Donations and philanthropic gifts should be channelled through the Fundraising and Supporter Development Office to ensure adherence to this policy.
Other proposed collaborations and funding applications	Faculties, Schools and Divisions are required to have an appropriate local committee to review all such activity brought to their attention, with the Executive Dean or Head of School/Division acting as the ultimate approving authority. The committee should ensure that applications comply with this policy statement and any other relevant policy or local guidelines.
	Applications may only be submitted or agreements signed

once the arrangements have been fully approved in writing by the Executive Dean or Head of School/Division. Executive Deans and Heads of School/Division have a responsibility to ensure that agreements are only signed or contractual relationships entered into by an appropriate College signatory who has the appropriate delegated authority from the Vice President (Finance).

A flow chart of the process for funded research applications, institutional consultancy, fee-for-service work and inter-organisational collaborations is attached as an Appendix to this policy.

It is recognised that there may be exceptional circumstances where it may not be possible to reach a decision locally. In such circumstances, the matter should be referred to the Operations Director (Research & Researchers) whose office will be able to advise whether the College has worked with the organisation, or a related organisation, before. Directorate staff may also be able to assist with any procedures that have to be complied with. Where a case is referred to the Operations Director (Research & Researchers) following consultation with the Executive Dean or Head of Division, a due diligence report will be compiled and the matter referred to the Principal for a final decision.

The Operations Director (Research & Researchers) will make an annual report to the College Research Committee regarding all cases that have been referred to his office for action.

Date of Next Review:

July 2024

Responsibility for Policy Statement:

Operations Director (Research & Researchers)

Policy Statement Review Cycle:

Two yearly

**Process for Funded Research Applications, Institutional Consultancy, Fee-for-Service work, inter-organisational collaborations, etc.**

**Note:** For research grants, research contracts, fee-for-service contracts and institutional consultancy the formal application, approval and institutional acceptance processes are set out in College's *Financial Procedures*, requiring review and approval by Executive Dean / Head of School/Division to ensure that all projects in their area of responsibility comply with the College's *Financial Procedures* and '*Policy statement and procedures for the acceptance of external funding and collaboration with organisations and individuals*'.

