

Financial Conflicts of Interest in Research: Statement of Principles

Universities and members of their faculty and staff engage in increasingly complex relationships with private entities, both for-profit and non-profit, on the one hand, and, on the other hand, with the federal and state governments. The University of California, San Francisco (UCSF) supports the translation of results from these research relationships into practical applications for the public good. To this end, the University supports patenting and licensing activities to ensure that faculty inventions are protected, and permits faculty to participate in the establishment of industry partnerships designed to commercialize novel technologies, to accept company-sponsored research funding, and to consult for private companies. Such relationships must always be in harmony with the mission of UCSF and in support of its principal objectives, teaching, research and service, as well as legal, policy and ethical requirements. It is essential, however, that such relationships not create inappropriate external biases affecting the freedom of faculty to pursue all areas of academic inquiry. In addition, UCSF recognizes its obligation to the community of scholars and to the public to ensure that research and scholarly activity are carried out under the highest standards of ethical conduct. The principles delineated within this document, therefore, should guide research and development relationships.

Ethical Conduct of Research

Principle: Academic institutions have legal and moral responsibility for the integrity of research carried out under their aegis.

Scholars are expected, both by society at large and by colleagues within the academic/research community, to conduct and report research with skill and objectivity. They must comply with legal, policy and ethical requirements. In return, society provides scholars with the funds to support research endeavors and allows them, within limits, the freedom to select the research they will pursue and to benefit financially from the results of those endeavors. Failure to honor this implied contract puts both the integrity of the research and the confidence of the public at risk and is not acceptable.

Conflicts of Interest

Principle: A conflict of interest in research exists when an individual or institution has interests in the outcome of the research that might compromise the integrity of the research.

Conflicts of interest are unavoidable and pervasive. Some are stated or implied, such as the conflict of interest between professional advancement, academic position, salary, professional status and/or power, on the one hand, and research integrity on the other; or the conflict between scientific integrity and extra-institutional interests such as religious, political or social beliefs.

Among the issues for which institutions are accountable are conflicts of interest. UCSF has a responsibility to have in place safeguards to prevent employees, consultants, members of governing bodies and others involved in extramurally-supported activities from using positions that are, or give the appearance of being, motivated by a desire for private gain for themselves. Additionally, there are safeguards to demonstrate primary allegiance to UC, prevention of harm to vulnerable

populations like patients, human research subjects and students, preservation of UC resources, transparency, non-bias in design, conduct and reporting of research or provision of clinical care.

It is important to appreciate that the conflict of interest must be assessed within a specific factual context and not merely presumed to exist in the absence of facts supporting such a conclusion. The perception of reduced quality and trustworthiness of the research resides within the situation and not in any anticipated or expected behavior of the individual.

The teaching and research environment should promote the free exchange of ideas, information and materials among students and faculty in all forums. Selection of students and trainees for participation in research projects should not be inappropriately influenced by the interests of the sponsor or by an investigator's financial interests in the sponsor. An investigator's financial interest in a sponsor should be disclosed to all students and trainees before they consider participating in a research project.

Conflict of Financial Interests

Principle: Among the issues for which institutions are accountable are financial conflicts of interest.

Payment for services rendered does not in itself constitute a conflict of interest. Similarly, severe restrictions on financial benefits to investigators for their research products may inhibit or prevent research developments. It is essential, therefore, for the University to have a clear, equitable and efficient mechanism for managing financial conflicts of interest. This authority is granted to the COIAC at UCSF.

Management of financial conflicts of interest must be part of the regular oversight provided by the campus over research. One such part is the creation and maintenance of a "culture of disclosure" in publications and presentations to help ensure that the scholarly community understands the various influences that affect the conduct and reporting of research. Such a "culture of disclosure" would also enhance the public's trust in the conduct of research and serve to protect human research subjects.