# Conflict of Interest data collection process

## Background

As part of the ARC’s operationalization of the new legislative requirements under the amended ARC Amendment Act 2024, all Higher Education Providers (HEPs) will be required to enter into Deeds of Variation.

These Deeds include provisions that will require HEPs to seek Conflict of Interest (COI) declarations from all CIs (regardless of employing HEP) for any lead ARC Grant that is impacted by the Deed of Variation process.

Where a conflict is identified, this information will be uploaded to the ARC RMS in the format specified by the ARC (see **Appendix A** for format).

ARC have advised that the Employing HEP will remain responsible for managing the declared COI (although this is unclear in the Deed itself).

## Purpose

The Purpose of this paper is to describe a high level process that may be used by a HEP to collect this information. It is understood that process detail will vary from HEP to HEP depending on local systems, policies and processes.

**The document is Advisory** – Each HEP must make its own decision as to the appropriateness and desirability of the process described.

The process described here has been reviewed by the members of the ARMS Research Post-Award SIG, which includes members from 24 HEPS and several funding agencies.

## Process

**Preparation**: Gather information, including list for all impacted lead ARC Grants and contact details (Name, Employing Organization, Email) for each CI named on impacted lead ARC Grants.

**Step 1**: Email each listed CI, asking that they identify any COIs in relation to the specified ARC Grant. Each HEP to contact every CI list on grants for which they are lead (including CIs at other HEPs).

This email should:

* Specify the Grant/s in question
* Request completion of all necessary data fields as per the ‘ARC mandated COI upload format’ (**Appendix A**)
* Specify a deadline for response (suggest two weeks).
* Note that if no response is received, the non-response will be recorded and ARC will be informed that there is no COI has been declared.

See sample email text in **Appendix B**.

**Step 2**: If no response has been received, send reminder email 2 days before deadline. See sample reminder email text in **Appendix B**.

**Step 3**: Post Deadline, ensure that:

* All communications are recorded and appropriately document managed as per your organizations Policies.
* All declared COI are collated into the ARC mandated COI upload format document (**Appendix A**). In doing so, no COI will be noted in cases where there has not been a response from a CI.
* Update RMS and upload the ARC mandated COI upload format document as per ARC instructions (pending).

**Step 4:** Where a COI is declared, inform the Employing HEPs Research Office. This is important given that the employing HEP retains responsibility for managing any COI.

**Process End**

## Appendix A: ARC mandated COI upload format (Excel file)



Embedded Excel File:



## Appendix B: Sample email text

## Initial Email to CI

To: [Email Adress of CI]

Subject: Mandatory ARC Conflict of Interest (COI) declaration – Request for Information

Dear [First Name]

As a result of recent changes to the ARC Funding Agreements, we are now required to report on any actual, potential or perceived COIs relating to any [HEP] lead grants on which you are a named Chief Investigator (CI).

This obligation extends to all CIs on these grants, regardless of the employing University, and to all Universities. You may therefore receive similar requests from other organizations.

* If you have no COI, please simply respond ‘No COIs’ by return email by [Date – 2 Weeks post send].
* If you do have a COI, please complete all fields in the table below, and return to us by email (by reply to this email address) by [Date – 2 Weeks post send].

If we do not receive a response, we will note that no COI has been declared in our response to the ARC. Please note:

* We are only asking for declarations of COI relevant to this specific grant.
* Your employer retains responsibility for managing any COI. If not done so already, please also declare the COI as required by your local processes.
* We will provide and COI declaration to the ARC, however, this will not result in a change to your Chief Investigators RMS profile.

Please complete all fields in the table below if you have a COI to declare:

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Declaring Researcher Name** | **Declaring Researchers Administering Organisation** | Conflict of Interest Type(Actual / Potential / Perceived) | **Entity Type**(Organisation / Person / Other) | Relationship Type(Personal / Professional) | **Entity Name** | **Brief description of COI**(100 characters) | **Start Date of COI** | **End Date of COI** |
| **[First name; Surname]** | [HEP] |  |  |  |  |  |  |  |
| **[First name; Surname]** | [HEP] |  |  |  |  |  |  |  |
| **[First name; Surname]** | [HEP] |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

Definitions of non-obvious fields:

|  |  |
| --- | --- |
| **Entity Type** | Is your COI with another **Organization** associated with the grant, or with another **Person** associated with the Grant? Select ‘**Other**’ of neither of these is quite right. |
| **Relationship Type** | Relationship type refers to whether the COI is Personal or Professional in nature. Please select "Not Applicable" neither of these is quite right. |
| **Entity Name** | Name of the Organisation, Person or Other which whom you have the declared COI. |
| **End Date of COI** | When the COI ceased. Only complete this section if the COI is to cease during the life cycle of the project  |

Regards,

[Name]

[Signature Block]

## Reminder Email to CI (to be sent as a forward of the original email, so CI can see original email in the chain and respond from the reminder email).

To: [Email Adress of CI]

Subject: Reminder: Mandatory ARC Conflict of Interest (COI) declaration – Request for Information

Dear [First Name]

This is just a reminder of the request sent to you on [Date] – see Email below.

If you could please respond by [Date], that would be very much appreciated.

Regards,

[Name]

[Signature Block]