Regarding the Case and Reform Measures Related to Social Cooperation Programs

The recent media coverage concerning the University's Social Cooperation Program (the Clinical Cannabinoid Research Social Cooperation Program) represents a serious matter that directly impacts public trust in our institution.

The incident constitutes an extremely inappropriate act that is absolutely unacceptable for any member of our university. We, the university executive leadership, deeply feel responsible for having failed to prevent such a situation. In order to restore public trust, we recognize the need to clarify the facts, fulfill our responsibility to explain, and thoroughly examine why such misconduct occurred, why compliance violations were not prevented, and where improvements are necessary.

Under the guidance of an independent law firm, the University of Tokyo is currently investigating the facts. Any actions found to be in violation of University regulations will be dealt with strictly and appropriately.

To swiftly address the issues identified during the investigation, we have established the Investigation and Reform Committee on Social Cooperation Programs. This committee has formulated a reform plan for the operation of such courses, based on four key pillars:
1. Ensuring thorough ethical awareness among faculty and staff,
2. Strengthening governance by the university headquarters,
3. Establishing verification and checking systems at contract and establishment stages,
4. Strengthening management by divisions after programs begin operation.

These measures will be implemented immediately to build a sound operational framework with strengthened governance.

Going forward, we will reinforce the review mechanisms not only for Social Cooperation Programs but also for all research and educational activities involving partnerships with industry, both at the time of contract and at the start of operations. Furthermore, taking this incident as a critical lesson—and referring to the swift responses seen in private-sector companies—we will promptly undertake a fundamental restructuring of the university's compliance response system.

Teruo Fujii
President, The University of Tokyo

Institutional Reforms for
Research and Education Conducted with Funding
from Private Companies and Other Entities

Investigation and Reform Committee on Social Cooperation Programs

Since July of this year, the Committee has been investigating the system for research and education conducted with funding from private companies and other entities, including Social Cooperation Programs, and has been reviewing reform measures based on this investigation.

Based on the investigation to date, we have formulated the following reform measures.

Basic Approach to Reform Measures

- During our investigation of the case concerning the Clinical Cannabinoid Research Social Cooperation Program established at the Graduate School of Medicine, we have come to recognize the lack of ethical awareness among some faculty and staff members in Social Cooperation Programs, the inadequacies in the University's system that failed to prevent such incidents, and governance challenges in the University's methods for verifying partner organizations and managing operations after the establishment of such programs.

- These challenges are considered to be fundamental not only to social cooperation programs but also to all research and education conducted with funding from private companies and other entities,[1] including corporate sponsored research programs, collaborative research, and commissioned research.

- Research and education conducted with funding from private companies and other entities, including social cooperation programs, are, of course, extremely important activities in order for the University of Tokyo to address societal needs and keep pace with the latest academic research trends as well as to contribute to society's development by sharing the outcomes. To maintain and expand these activities in the future, it is essential that the University of Tokyo conduct its activities while earning

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[1] Including cases of so-called "zero-yen contracts" where no external funding is received.

the trust not only of collaborating private companies and other entities but also of society as a whole.

- Therefore, the University of Tokyo will work to ensure thorough ethical awareness among faculty and staff members, and, under the leadership of the Investigation and Reform Committee on Social Cooperation Programs, it will urgently implement necessary institutional reforms and operational improvements to achieve appropriate partner selection, appropriate selection of topics for research and education, careful examination of contract terms, and proper management after programs begin operation across all research and education conducted with external funding.[2]

- The current reform policies are outlined below. The University will continue its review and implement further reform measures as needed.

Reform Policies

Ensuring Thorough Ethical Awareness Among Faculty and Staff

The University of Tokyo will strengthen measures to thoroughly instill ethical awareness, including emphasizing that faculty and staff are quasi-public servants and that the acceptance of meals, gifts, and other hospitality is prohibited.

Strengthening Governance by University Headquarters

While maintaining divisions (*bukyoku*) as the primary entities for research and education, the University will strengthen the involvement and authority of University Headquarters in contracts, the establishment of programs, and the management during implementation periods of research and education conducted with funding from private companies and other entities, establishing a system to prevent inappropriate incidents.

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[2] The relevant operations will be handled for the time being by the current responsible departments at University Headquarters (Research Promotion Department and University Corporate Relations Legal Department). Those responsibilities will be assumed by the Research Integrity and Security Promotion Office under the Provost after that office has been established.

Establishing Verification and Checking Systems for Program Establishment and Contract Stages

The University will develop review systems and guidelines to appropriately assess the status of partner organizations at the time of establishment of a program and conclusion of a contract.

Strengthening Management by Divisions After Programs Begin Operation

The University will establish a system to maintain discipline at the division level regarding fund management and operational status after programs begin operation.

Ensuring Thorough Ethical Awareness Among Faculty and Staff

- The University will enhance the compliance training that all faculty and staff are required to take annually.
  - It will be emphasized that University of Tokyo faculty and staff are quasi-public servants, that the acceptance of meals, gifts, and other hospitality is prohibited, and that they must uphold the University of Tokyo Regulations on Ethics for Academic and Administrative Staff[3], with these points incorporated into training materials and post-training comprehension tests (implemented since July of this year).
- The University will provide special training on ethics and points of concern for the establishment and management of programs for those involved in research and education conducted with external funding, emphasizing that they are placing themselves in higher-risk situations than usual.
- The University will require submission of written pledges to comply with the University of Tokyo Regulations on Ethics for Academic and Administrative Staff, from relevant faculty and staff when beginning research and education conducted with funding from private companies and other entities.
- The University will enhance the provision of support information for researchers, including codes of conduct and ethics regulations that indicate appropriate attitudes

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[3] This refers collectively to the University of Tokyo Regulations on Ethics for Academic and Administrative Staff, the University of Tokyo Hospital Regulations on Ethics for Academic and Administrative Staff, and the Institute of Medical Science, the University of Tokyo Regulations on Ethics for Academic and Administrative Staff.

both for faculty and staff and for private companies and other entities regarding research and education conducted with external funding.

- The University will ensure thorough awareness of internal reporting (whistleblowing) systems and expand their functions.

Strengthening Governance by University Headquarters

Prior Notification of Rules

- The University will promote understanding and strengthen awareness of rules to be observed among funding providers and collaborative research partners through leaflets and other materials.

Establishing a Consultation System with University Headquarters About Cases of Concern

- The University will establish a system allowing consultation with University Headquarters when there are concerns about contract content during division review at the time of program establishment and contracting.

  ➢ Cases of concern will be judged for appropriateness from an objective perspective at University Headquarters (including seeking opinions from external lawyers and other experts).

  ➢ The perspectives of Responsible Research and Innovation (RRI) and Ethical, Legal, and Social Issues (ELSI) will be incorporated into the objective assessments by University Headquarters.

  ➢ For contracts with extremely low funding from the other party or without any funding at all (so-called "zero-yen contracts"), an explanation of the reasons will be required before determination of the appropriateness.

Post-Establishment Operational Checks by University Headquarters

- University Headquarters will have the authority to proactively conduct unannounced checks of fund inflows and outflows and other operational conditions.

- University Headquarters may recommend the abolition of programs when operational conditions are deemed inappropriate as a result of its checks.

Reporting Cases of Concern to University Headquarters

- Divisions will report the operational status (income and expenditures, research progress, etc.) to University Headquarters for cases about which University Headquarters was consulted at the time of contracting and program establishment (i.e., cases of concern).

- University Headquarters will confirm whether programs are being operated appropriately, including by conducting surveys of partner organizations as necessary.

Submission of Evaluation Results to University Headquarters (for Social Cooperation Programs, Corporate Sponsored Research Programs, etc.)

- The University will make it mandatory to report annual evaluation results conducted by divisions to University Headquarters (for enhanced oversight). The reports will include progress on points of concern identified at the time of program establishment or contract.

  Note: For corporate sponsored research programs, it will be mandatory to report to University Headquarters the results of performance summaries conducted after the program ends.

Establishing Verification and Checking Systems for Program Establishment and Contract Stages

Formulation of University-wide Guidelines for Review Systems and Processes

- University Headquarters will formulate guidelines establishing certain standards for review systems and processes in divisions (University-wide guidelines).
  - ➢ External parties may be asked to participate in reviews as necessary.
  - ➢ Divisions may adopt review systems suited to their circumstances, provided they meet the standards set by University Headquarters.

Development of Checklists for Reviews

- University Headquarters will develop checklists based on a risk-based approach[4] for division reviews. Divisions will conduct reviews based on these checklists.

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[4] A method of prioritizing and efficiently implementing multiple measures according to the risk of cases evaluated in advance.

> ➢ The checklists will include items to be verified regarding the funding providers' financial status and background.

Screening of Personnel Employed with External Funds

- The University will introduce mechanisms to ensure impartiality, such as third-party participation in recruitment reviews for faculty and staff employed with external funds.

Strengthening Management by Divisions After Programs Begin Operation

- The University will establish a system to maintain discipline at the division level regarding operational status after programs begin operation.

- Divisions will thoroughly monitor deposits and withdrawals on a case-by-case basis and issue reminders for unpaid amounts.

  > ➢ Divisions will report to University Headquarters whenever they have confirmed that payment is overdue beyond a certain period after the payment deadline.

  > ➢ University Headquarters will confirm the circumstances of the nonpayment and will conduct interviews with the other party as necessary.

Specific reform measures

- In order to prevent cases such as the inappropriate incident related to Social Cooperation Programs, it is essential not only to ensure thorough ethical awareness among faculty and staff individually, but also to establish a system in which the headquarters is involved in the oversight functions that have traditionally been left to divisions, thereby enhancing checks and balances and ensuring effective governance across the entire university. This time, by implementing reform measures on both fronts, we have formulated concrete measures necessary to build an environment in which the overall system for research and education conducted with funding from private companies and other entities can operate with the trust of society.

- In formulating the above-mentioned reform measures in concrete terms, we established two working groups, the "Ethics Working Group" and the "Governance Working Group," and have been proceeding with the reviews.

[Reviews in the Ethics Working Group]

- As the concrete measures to ensure thorough ethical awareness among faculty and staff, the Ethics Working Group decided to conduct:
  (i)   Preparation of a checklist for maintaining ethics, conducting related training, and thorough utilization of the checklist; and
  (ii) Formulation of a code of ethics and enhancement of information provision to faculty and staff, and private companies and other entities.

In addition, the group presented concrete proposals for a self-check checklist and informational materials aimed at faculty and staff, private companies and other entities.

[Reviews in the Governance Working Group]

- The Governance Working Group, as part of efforts to strengthen governance by University Headquarters, clarified the specific content of the following items:
  (i)   Prior notification of rules;
  (ii) Establishing a consultation system with University Headquarters concerning cases of concern;
  (iii) Post-establishment operational checks by University Headquarters;
  (iv) Reporting cases of concern to University Headquarters; and
  (v)   Submission of evaluation results to University Headquarters.

In addition, the group clarified the responsibilities of relevant parties at each stage of the screening flow, and developed such formats as university-wide guidelines, checklists, and pledge forms.

- Based on the results of these reviews, we will implement concrete measures one by one, while making continuous review and improvement efforts to further enhance the environment for research and education conducted with funding from private companies and other entities.

References

Social Cooperation Programs, etc.

Courses and research programs established utilizing funds received from external organizations in the private sector and elsewhere (not including national research or development agencies) that seek to conduct research collaboratively with the University on issues of mutual interest with high social significance.

Corporate Sponsored Research Programs, etc.

Courses and research programs established in undergraduate faculties, graduate schools, and other graduate-level organizations, whose basic expenses are covered by funds donated by individuals or organizations.

Collaborative Research

Research conducted collaboratively by the University with external organizations in the private sector and elsewhere. This includes research conducted collaboratively by university faculty with researchers from private organizations on issues of mutual interest after accepting into the University researchers, research funds, etc. from the private organizations, as well as research conducted separately by the University and by the private organizations on issues of mutual interest after accepting into the University both researchers and research funds or only research funds from the private organizations.

Commissioned Research

Research conducted by the University upon commission from external parties, with the commissioning party bearing the necessary expenses.