

# 上智大学研究費の適正な使用・管理のガイドライン Sophia University Guidelines for Appropriate Use and Management of Research Funds

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## 1. Purpose

The purpose of these Guidelines is to ensure appropriate use and management of research funds of Sophia University (hereinafter, "the University").

## 2. Definitions

The terms listed in the following items are used in these Guidelines with the meanings defined for each term.

### (1) Research funds

(i) Funds provided as government subsidies

(ii) Funds provided for commissioned research, collaborative research, or other commissioned research services

(iii) External funds other than the preceding (i) and (ii) that the Sophia School Corporation (hereinafter, "the School") is delegated to administer and manage

(iv) All funds disbursed by the School for use in education and research including Individual Education/Research Allowance

### (2) Researchers

Faculty members and researchers affiliated with the University, and others engaged in research activities in the University

### (3) Staff

Persons employed by the School and involved in the disbursement and management of research funds

## 3. Obligations of researchers and staff

### (1) Observance of rules and regulations

Researchers and staff shall use and manage research funds properly, in compliance with these Guidelines, with the Sophia University Guidelines for Academic Research Ethics, and with other regulations stipulated by the School as well as applicable laws and ordinances.

### (2) Prohibition of misuse

Researchers and staff, fully aware of their responsibility to society for appropriate use and management of research funds, and recognizing that any misconduct in use of funds by an individual is an act directly hindering the education and research activities of the entire University and damaging its reputation, shall under no circumstances misuse research funds and shall not be complicit in such misuse.

## 4. Clarification of organizational responsibility

The persons responsible for appropriate use and management of research funds shall be as follows.

### (1) Chief management officer

The chief management officer shall be the University President, who shall exercise overall governance and have ultimate responsibility for the use and management of research funds.

### (2) Administrative management officer

The administrative management officer shall be the Vice President for Academic Research Affairs, who shall assist the chief executive officer and have effective responsibility and authority for governance of the entire organization regarding the use and management of research funds.

### (3) Compliance promotion officer

The compliance promotion officer shall be the head of each education and research organization as stipulated in the Sophia School Corporation Personnel System (Dean of the Graduate School, Dean of the Faculty, Director, Sophia Research Organization, Deputy Director) and the head of each administrative organization (Bureau Director), who shall have responsibility and authority regarding the use and management of research funds in each organizational unit.

### (4) Compliance promotion deputy officer

The compliance promotion deputy officer shall be the person directly under the organization head prescribed in the preceding clause (Chairperson of Course and Department), who shall assist the compliance promotion officer and have day-to-day responsibility and authority regarding the use and management of research funds.

## 5. Provision of an environment as a basis for proper administration and management

### (1) Unification and clarification of rules

(i) The University shall create clear, standard rules consolidating the individually drawn up rules on use of research funds, so that research fund use can proceed smoothly and appropriately.

(ii) Misuse shall mean the use of research funds for other than the intended uses, whether willfully or through gross negligence, or the use of research funds in a manner that is not in compliance with the content of the decision on granting funds or the conditions by which they are granted. The main types of misuse include the following.

Deposit fraud: Having the University pay for fictitious transactions and having the funds managed by a partner company, etc.

Travel expense fraud: Having the University pay for travel expenses that were not incurred

Remuneration fraud: Having the University pay for work that was not performed

### (2) Provision of rules and manuals, etc.

The University shall endeavor to make the rules concerning use and management of research funds more effective and valid, by reviewing existing rules and drawing up new ones and by creating administrative work manuals, and shall ensure that researchers are thoroughly familiar with the rules, raising their awareness regarding proper use and management of research funds.

### (3) Compliance training and submission of a written pledge

Researchers and staff who are involved in the use and management of research funds shall undergo compliance training on the use and management of research funds, and shall submit a written pledge that they will observe the rules and not engage in misuse, and acknowledging their legal responsibility and liability for strict disciplinary measures in case of misconduct.

### (4) Implementation of enhancement activities

(i) The Chief Management Officer shall conduct regular enhancement activities addressing the entire organization to raise and instill awareness of all constituent members about elimination of misuse.

(ii) The Administrative Management Officer shall draw up plans for the enhancement activities.

(iii) The Compliance Promotion Officer shall conduct regular enhancement activities addressing all constituent members involved in the use and management of competitive research funds in the organizational units.

## 6. Determining the causes of misuse and drawing up and implementing prevention plans

### (1) Determining the causes of misuse

The University shall determine the factors leading to misuse of research funds by researchers or staff, and shall take corrective measures.

### (2) Drawing up and implementing prevention plans

The University shall draw up and fully implement plans for preventing misuse of research funds by establishing a proper administrative and management structure, and shall subject the plans to regular review, ensuring that they remain highly effective.

### (3) Organization for carrying out prevention plans

The University shall place an organization in charge of carrying out the misuse prevention plans, so that the objectives set forth in the preceding clause can be met; and this role shall be filled by the Center for Research Promotion and Support in the Bureau of Academic Research and Information.

## 7. Actions for proper use and management of research funds

### (1) Use of research funds

Researchers shall regularly monitor their use of research funds and shall implement the budget properly and effectively.

### (2) Advance payment of research funds

If the payment of research funds issued by public agencies or incorporated administrative agencies, etc., has been delayed even though the research period has started, the University shall take such measures as making advance partial payment of research funds provisionally under the Bylaws for Advance Payment of Part of Research Funds, etc., of Sophia University, and shall endeavor to facilitate research activities while eliminating factors that may lead to misuse.

### (3) Ordering, delivery, and inspection

Placement of orders, deliveries, and inspections for goods, etc., using research funds shall be made appropriately in accordance with the relevant regulations and rules of the School.

### (4) Managing work and remuneration of employed personnel

(i) The procedures for hiring, work management, and remuneration of persons employed using research funds shall be carried out properly in accordance with the type of employment and with the Sophia School Corporation Rules of Employment, Sophia School Corporation Rules of Employment for Temporary Employees, Sophia School Corporation Manual of Treatment of Remunerations, and other regulations stipulated by the School as well as applicable laws and ordinances.

(ii) The compliance promotion officer shall verify that work was performed and the payment was received, through such means as written or oral confirmation from the parties concerned.

### (5) Management of travel expenses

(i) The management of travel by persons involved in the research and travel expenses using research funds shall be carried out properly in accordance with the Sophia School Corporation Travel Expense Regulations, Sophia University Detailed Rules for Treatment of Travel Expenses in Scientific Research Fund Subsidized Projects, and other regulations stipulated by the School as well as applicable laws and ordinances.

(ii) The compliance promotion officer shall verify that travel took place based on receipts and other evidence.

### (6) Penalizing misuse

(i) When misuse of research funds is discovered or suspected, the compliance promotion officer shall report to the chief executive officer without delay or omission.

(ii) Upon receipt of the report set forth in the preceding clause, the chief executive officer shall take strict disciplinary action in accordance with the regulations stipulated by the University or the School as well as applicable laws and ordinances.

### (7) Communication to partner companies, etc.

(i) The compliance promotion officer shall explain these Guidelines and internal regulations, etc. to partner companies, etc., shall ask them to comply with the rules, and shall instruct them to conduct fair business dealings.

(ii) In case a partner company, etc. was involved in misuse of research funds, the chief executive officer shall take strict disciplinary action based on separately determined standards.

## 8. Establishing an organizational structure for communication of information

### (1) Consultation

Consultations shall be accepted from inside and outside the University regarding rules and administrative procedures for proper use and management of research funds, with separate consultation offices being provided for the two classes of consultation in (i) and (ii) below; and they shall be handled properly.

(i) 2. Definitions (1) Research funds (i) to (iii): Center for Research Promotion and Support, Bureau of Academic Research and Information

(ii) 2. Definitions (1) Research funds (iv): Office of Accounting, Office of Financial Affairs

### (2) Whistleblowing

(i) Reports of unauthorized use of research funds shall be accepted by the whistleblowing contact in the Audit Office.

(ii) Reports of misuse shall be handled in accordance with the Internal Rules on Procedures for Investigating Misuse of Public Research Funds in Sophia University.

## 9. Monitoring

### (1) Monitoring by each organizational unit

Organizational units involved in the use and management of research funds shall endeavor to ensure appropriate execution and management in collaboration with each other by monitoring the status of research fund use.

### (2) Internal auditing and monitoring by the Audit Office

The Audit Office shall conduct internal auditing on research fund use in accordance with the Sophia School Corporation Regulations for Internal Audit. The Audit Office shall confirm whether monitoring of research funds by the University is functioning properly, and shall propose corrections and improvements as necessary.

## 10. The role of Auditor

### (1) Confirming the internal control over prevention of misuse

The Auditor shall confirm the design and operation status of internal controls over misuse from the perspectives of the entire organization and regularly report the results and deliver opinion at Board Meetings.

### (2) Confirming the misuse prevention plans

The Auditor shall confirm that the results of monitoring and internal auditing conducted by the Administrative Management Officer or the Compliance Promotion Officer identifying the factors that have led to the misuse are reflected on the misuse prevention plans. The Auditor shall also check that the misuse prevention plans are properly implemented, and the results are regularly reported, and opinions delivered at Board Meetings.

### Supplementary Provision

These Guidelines are effective as of January 1, 2012.

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These Guidelines are revised and effective as of July 1, 2012.

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Note: The English translation is provided for information. The original Japanese version remains the sole official version. If there is any discrepancy between the two versions, the Japanese original should take precedence.