# UNIVERSITY OF CAPE TOWN

## PRE-AWARD AND POST-AWARD GUIDELINES AND PROCEDURES IN REGARD TO EXTERNALLY FUNDED RESEARCH

The following guidelines present an integrated codification of the existing ethical and financial obligations and underlying policies that serve to inform the various processes and procedures applicable to the management of externally funded research. The guidelines focus on the role and responsibilities of the researcher and currently does not detail the full support offered by the various support structures in the faculties, the Research Office, Research Contracts and Innovation, Central Finance including Central Research Finance, the Department of Alumni and Development and Human Resources.

The full and detailed processes and policies for both pre-awards and post-awards, plus the parallel processes of ethics clearance, data management, biosafety requirements, processing of donations with associated S18A tax certificates, fund opening and management, progress reporting, project management and project close-out have been mapped in detail and are included on the Research Project Navigator (RPN) website. In addition, the detailed processes and procedures for the award application, processing and project management and closure of the primary funders of research at UCT have been mapped and are available on the website.

## CONTENTS

## GUIDELINE OWNER

Deputy Vice-Chancellor: Research and Internationalisation

## DEFINITIONS

In this guideline the following terms carry the meanings as defined below.

*Budget:* A budget is a detailed statement outlining estimated project costs that support a funded research project. Budgets should include all direct costs, staff costs, and other administrative costs required to carry out the project's objectives, as detailed in the proposal narrative.

*Central Research Finance:* The central finance function responsible for the financial management, reporting, compliance, and administration of externally funded research grants and contracts across the University.

*Collaborator:* An individual or organisation that contributes to a research project through the provision of expertise, resources, facilities, data, or other forms of support.

*Consortium:* A consortium is where UCT partners with other parties from various sectors to work together on a large-scale research project. The terms and conditions of the collaborative effort are governed by a Consortium Agreement.

*Consultant*: any person or organisation that is contracted to share technical expertise or to provide guidance on specified issues.

*Donation:* A philanthropic contribution to support research activities with no expectation of counter-performance. Donations can be restricted (purpose-specific) or unrestricted.

*Electronic Research Administration (eRA) System:* UCT's digital system for recording, approving, and administrating research contracts, grants, and compliance processes. Formally known as Converis.

*Faculty Finance:* The finance function within a faculty that provides financial management, reporting, compliance, and support services for faculty operations and research activities.

*Full costing:* A budgeting method that includes all direct and indirect costs associated with delivering the project to ensure financial sustainability.

*Funder*: Any individual or organisation that provides money to the University of Cape Town for the purpose of research, in regard to which it is necessary to conclude a contract.

*Legal Advisor*: A person appointed in writing by the Registrar as a Legal Advisor, Senior Legal Advisor or Senior Manager Innovation in the department of Research Contracts & Innovation (RC&I).

*Pre-award:* The period before a project is funded, covering activities such as identifying opportunities, preparing a proposal, submitting an application, and negotiating and signing a contract.

*Principal investigator (PI):* The lead researcher responsible for the overall conduct, management, and delivery of a research project, including compliance with funder and University requirements.

*Post-award:* The period after a project is funded, covering project setup, project execution, ongoing management, reporting, and project closure.

*Sub-awardee*: See 'Subgrantee'.

*Subgrant agreement*: The contract in terms of which the funds are passed on to a Subgrantee and in which the Sub-awardee/Subgrantee's rights and duties are specified.

*Subgrant*: the funds that UCT passes on to a Subgrantee.

*Subgrantee (which for the purposes of this guideline is understood to be synonymous with 'Sub-awardee' and 'Sub-recipient)*: Any individual to whom, or organisation to which, UCT forwards funding from the Funder from whom UCT receives funding and where the Subgrantee was a co-applicant in respect of the funding application or where UCT receives funding from a Funder who specifies the requirements for the selection process of the Subgrantees for receipt of a portion of the funding for the purpose of carrying out a programmatic segment of a research project for which UCT is primarily responsible or for research in a specific field.

A Subgrantee will normally have contractually specified decision-making obligations in order to realize the goal or goals of the segment of the research project for which they are responsible (and thus the term excludes consultants and subcontractors).

A Subgrantee is subject to due-diligence analysis and approval as set out in this guideline and the policies and procedures incorporated by reference into this guideline.

*Subcontractor*: Any individual or organisation that does not have an obligation to carry out a research project or a programmatic segment thereof but is contracted to provide a specific service or goods associated with the research project. The subcontractor may therefore be either a consultant or a vendor.

*Sub-recipient*: See Subgrantee.

*Technical due diligence:* An assessment of the scientific, methodological and operational soundness of a research project, collaboration, or sub-awardee, ensuring feasibility, capability and compliance before work begins.

*Due Diligence:* A review of the financial capacity, controls, non-financial policies, and risk profile of a project partner or sub-awardee to ensure they can manage and report on all resources responsibly.

*Vendor*: Any individual or organisation that provides similar goods and services to multiple customers as part of their routine business operations.

**INTRODUCTION: THE PURPOSE OF THESE GUIDELINES**

The University of Cape Town (UCT) conducts research projects funded by sponsors external to the University and such external sources include governmental funding (from South Africa as well as from foreign governments and supra-national organisations) as well as private funding from individuals, foundations, donors, associations and corporations. It is of the utmost importance that there should be complete ethical and financial probity in regard to the administration of such external grants and that the administration of these grants should, always, be compliant with UCT's as well as the funder's policies and procedures.

These guidelines aim to clarify the ethical and financial policies and procedures for managing externally funded research. By referencing relevant existing policies and confirming current roles and responsibilities, they are designed to guide staff involved in this process and provide assurance to funders and other stakeholders.

This purpose is two-fold:

1. to comply with international best practice (and what major funders insist upon), namely that appropriate pre- and post-award policies and procedures must not only be in place *de facto* in organisations receiving funding, but that those organisations must have formally adopted these obligations and procedures in a university-wide guideline.
2. by collecting in one guideline document the relevant obligations and procedures, members of staff responsible for the management of externally funded research will have clarity about their obligations in this regard.

A. PRE-AWARD

Proposal Development, Coordination, and Submission Requirements

1.1 Principal investigator responsibilities.

The principal investigator ("PI") is responsible for:

- developing any funding proposal to an external funder;
- complying with the requirements, processes and timelines of both UCT and the external funder in regard to the submission of a funding proposal, including completing all forms required by UCT and the external funder – and specifically complying with UCT's internal approvals process via the University's electronic Research Administration ("eRA") system; and
- submitting the proposal, except in cases where the funder requires submission by the institution.
  In case of the latter, it is the PI's responsibility to ensure that the timelines set by the relevant UCT institutional authorities are adhered to in order to facilitate and ensure timeous submission by the institution through the UCT Research Contracts and Innovation (RC&I) office or the Research Office (RO). The RC&I office requires receipt of any documents for submission **five days** prior to the funder submission deadline and each Faculty must set clear timelines for the submission of documents to

the Budget Reviewer, Finance Approver and Final Faculty Approver in order to make timeous submission to RC&I feasible.

1.2 Approval process.

For eRA internal approvals, either the application-stage approval process or the contract-stage approval process, must be used.

- The application-stage approval process must be followed when a PI is applying for a research grant in response to a funding call (as outlined in Section 1.2.1).
- The contract-stage approval process must be used when a PI did not respond to a call for proposals from a funder, but was awarded funding arising from a commissioned- or consultancy- or industry-led contract (as outlined in Section 1.2.2)[1]

Specific aspects that need to be attended to by the PI and other functionaries within UCT are outlined below:

*1.2.1. Application-stage internal approval in response to a funding call.*

*General*

Internal approval must be obtained via the eRA system for every submission of a funding/grant application to an external funding agency.[2] This includes all proposals for which UCT is the lead applicant institution AND all applications for which UCT is a co-applicant institution (would receive a sub-award if successful). In terms of this process, all budgets, resource declarations and regulatory declarations (including ethics) must be approved internally prior to the submission of a grant application to a funder, and require the following steps:

a) The PI is responsible for accurately declaring which ethics and biosafety clearances are required for the proposed research, as well as which resources are required with confirmation of these resources' availability. Where ethics or biosafety (or any other regulatory) approval is required for the research, the PI is responsible for obtaining the necessary clearance, approval, and/or exemption forms. Ethics approval is logged via eRA. For most funders, proof of ethics application will suffice at proposal submission stage, with full ethics approval required before the research commences. All research conducted at UCT must comply with UCT's *Policy for the Responsible Conduct of Research*[3] and any

[1] The entire approvals process is set out here: http://www.researchsupport.uct.ac.za/rsh/era/internal-process

[2] The process is set out in detail here: link http://www.researchsupport.uct.ac.za/rsh/era/internal-approvals-how-to Note 1: Applications for South African Medical Council Self-initiated Research Grants as well as applications to the Poliomyelitis Research Foundation must use the specific forms indicated in the eRA. For guidance in this regard, see: http://www.researchsupport.uct.ac.za/rsh/era/internal-process It is not compulsory for applications to the NRF and some URC schemes to make use of the eRA system, but require liaison with the appropriate offices in the research cluster to finalise submissions. Note 2: PASS staff applying for external grants should consult with IGH or RSS to confirm approval processes.

[3] https://www.uct.ac.za/sites/default/files/media/documents/Policy_Responsible_Conduct_Research_March2022.pdf

research involving human participants, animals or (potentially) hazardous biological agents (pHBAs) requires prior approval from the relevant faculty ethics, inter-faculty or bio-safety committees:

b) *Ethics and biosafety approvals*

(i) In regard to *research involving human participants*, the PI must obtain approval of the research according to faculty-specific guidelines and must comply with both faculty-specific policies[4] AND institutional policies (i.e. the *UCT Code of Ethics for Research Involving Human Participants*[5] and the UCT *Policy for the Responsible Conduct of Research*).[6]

(ii) In regard to *research involving animals*, the PI must comply with UCT's *Research Ethics Code for Use of Animals in Research and Teaching*[7] and must apply for a review of the research proposal to obtain ethics approval according to faculty-specific guidelines. A review entails prior approval of a research proposal by an ethics committee:

- *Faculty of Health Sciences*. The PI must comply with the *Policy on the Use of Animals in Teaching and Research Standard Operating procedures* specific to the Faculty of Health Sciences[8] and, where relevant, with the *UCT Policy and Standard Operating Procedure regarding the Scientific Use of Non-human Primates*.[9] The PI must apply for ethics approval to the Faculty of Health Sciences Animal Research Ethics Committee (FHS AEC), which operates according to the SOP and policy available on its website.[10]
- *Science Faculty*. The PI must apply for ethics approval to the Science Faculty Animal Ethics Committee.[11]
- *Faculty of Engineering and the Built Environment.* Research in EBE Faculty that involves animals is referred to the Faculty of Health Sciences Animal Ethics Committee (FHS AEC).

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[4] As outlined in the relevant faculty handbooks and other faculty-specific policies and procedures. For the Faculty of Health Sciences, see https://health.uct.ac.za/home/human-research-ethics

[5] https://www.uct.ac.za/sites/default/files/content_migration/uct_ac_za/39/files/Human_Research_Ethics_Code_2012.pdf

[6] https://www.uct.ac.za/sites/default/files/media/documents/Policy_Responsible_Conduct_Research_March2022.pdf

[7] http://www.researchsupport.uct.ac.za/sites/default/files/image_tool/images/362/Documents/Integrity/animalresearch_ethics_policy.pdf

[8] https://uct.ac.za/sites/default/files/content_migration/uct_ac_za/39/files/AEC_animal_use_SOP.pdf

[9] https://uct.ac.za/sites/default/files/content_migration/uct_ac_za/39/files/Policy_SOP_Non-Human_Primate_Scientific_Use_2015.pdf

[10] https://uct.ac.za/sites/default/files/content_migration/uct_ac_za/39/files/AEC_animal_use_SOP.pdf

[11] For contact details see: https://science.uct.ac.za/research-ethics

- *All other faculties*. Should the question of research involving animals arise in any other faculty, the guidance of the Office of Research Integrity (ORI) should be sought to ascertain how ethical clearance can validly be obtained.

(iii) Research *involving Human biological material*/specimens[12]*or data*[13]is conducted with oversight from the Faculty of Health Sciences Human Research Ethics Committee,[14] and the PI must submit the protocol to this committee for approval.

(iv) In regard to *research involving possibly hazardous biological agents* (pHBAs) the PI is responsible for compliance with directives from UCT's Institutional Biosafety Committee (IBC)[15] including the *Policy on Review of Research Protocols submitted to the IBC* (2020)[16] as well as with national guidelines (including the South African Medical Research Council (SAMRC) Guidelines for Ethics in Medical Research: Use of Biohazards & Radiation) and international guidelines (including the US National Institutes of Health (NIH) Guidelines on Research Involving Recombinant or Synthetic Nucleic Acid Molecules (including Human Gene Transfer Research).

The PI must apply for protocol-level review to the appropriate faculty-level biosafety committee (FBC)[17] in respect of any research involving recombinant or synthetic nucleic acid molecules, genetically modified organisms as well as potentially hazardous biological agents (but where appropriate the Institutional Biosafety Committee (IBC) will provide protocol-level review). The protocol must always be submitted first to the FBC and not directly to the IBC. In addition, before the protocol is submitted for biosafety review, it must have undergone scientific review in the relevant Department and the signature of the Head of Department (HoD) is required before it can be submitted to the FBC for review.

In addition, the PI must ensure that no research involving genetically modified organisms or pHBAs be initiated prior to approval by the FBC or IBC as the case may be.

(v) In certain instances, ethics approval should be sought from the *Inter-Faculty Human Research Ethics Committee* (IFHREC):[18]

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[12] Examples of human biological specimens are: blood (including blood smears on slides), plasma, serum, stool, urine, cells (red blood cells, white blood cells, lymphocytes, plasma cells, etc), tissue (including paraffin blocks), fluids (pleural, synovial, CSF, etc), DNA/RNA, hair, skin, nails, and fixed or stained slides containing a human component.

[13] Data refers to all information collected/obtained from a human participant during the research. There is nothing that is excluded.

[14] https://health.uct.ac.za/home/human-research-ethics-committee

[15] https://webcms.uct.ac.za/sites/default/files/image_tool/images/362/Documents/Integrity/IBC%20ToR%202020.pdf

[16] https://health.uct.ac.za/sites/default/files/content_migration/health_uct_ac_za/54/files/Policy%2520IBC%2520Final%2520PC10%25202020-2.pdf

[17] Regarding the Science Faculty's Biological Safety Committee, see https://science.uct.ac.za/about-us/faculty-overview under the heading "Science Faculty Governance and Committees" and in regard to the Faculty of Health Sciences FBC see generally https://health.uct.ac.za/home/biosafety

[18] Approved by PC 10/2021. [This committee is in the process of being activated.]

(1) The following research proposals (after registration with the Faculty) *must* be submitted to IFHREC: all research proposals involving health research (as defined in IFHREC) originating outside of the Faculty of Health Sciences, and which requires approval from the National Health Research Ethics Committee (NHREC) as per the requirements laid down in Chapter 9, Section 71-73 of the National Health Act No.61. 2003 (henceforth the NHA).

(2) The following other research proposals *may* be submitted to IFHREC:

(a) Researchers can submit directly to IFHREC (after registration of the project with the faculty) if

(aa) an external funder requires ethics approval from a committee with a US Federal Wide Assurance or SA NHREC registration; or

(bb) collaborating lead investigators are in different faculties and choose to submit to IFHREC (for example in the case of trans-disciplinary research projects that would benefit from review by a multi-disciplinary ethics committee); or

(cc) the investigator is from another institution and wishes to conduct research at UCT involving staff and/or students.

(b) A Faculty REC may refer research proposals:

(aa) that the Faculty identifies in its own SOPs to be of high ethical complexity and/or risk, and chooses to refer; or

(bb) where collaborators require approval from an externally registered ethics body (NHREC and/or OHRP) REC (e.g. NIH and all US federal agencies, NRF in some instances); or

(cc) multi-faculty projects involving UCT staff and/or students initiated external to UCT; or

(dd) transdisciplinary research projects that would benefit from review by a multi-disciplinary ethics committee.

c) Budget approvals

(i) The PI is responsible for the budget preparation, assisted by the relevant faculty's finance staff. The budget must consider both the faculty and institutional requirements, including the requirements regarding cost recovery,[19] Intellectual Property (IP),[20] [21][22] and other taxes, foreign exchange and currency fluctuations, and cash flow, as well as any funder requirements.

Specifically, regarding the costing and pricing of research, UCT's approach to the costing and pricing of research is set out in the *Policy for the Costing and Pricing of Research and Research-related Contracts*[23] in terms of which the calculation of direct and indirect costs is undertaken. This policy is supported by [24]*UCT's Full*

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[19] For UCT's Costing and Pricing Policy, see: http://www.rci.uct.ac.za/sites/default/files/image_tool/images/100/POLICY.pdf or http://www.researchsupport.uct.ac.za/rsh/proposals/forms-policies

[20] For the UCT IP Policy see: http://www.rci.uct.ac.za/rcips/ip/policy

[21] VAT classification is determined by RC&I using a VAT decision tree

[22] A costing template can be obtained here: http://www.researchsupport.uct.ac.za/rsh/proposals/forms-policies

[23] http://www.rci.uct.ac.za/sites/default/files/image_tool/images/100/POLICY.pdf

[24] http://www.rci.uct.ac.za/sites/default/files/image_tool/images/100/APPROACH.pdf

*Cost Approach to Costing and Pricing of research projects*￼ and PIs must familiarise themselves with the policy and with this document.

(ii) The budget that is to be included in an application for funding in response to a funding call must be approved via the eRA internal approval process prior to its submission to the funder. In terms of the eRA process, the budget must first be approved at faculty level and thereafter, in most cases, also at institutional level. At faculty level, the budget must go through three stages and, where needed, the PI should request assistance from Faculty Finance to identify the staff members responsible. The stages are:

(a) be assessed by a Budget Reviewer, who must liaise with the PI and agree on the budget and relevant rates for the application, and then make a recommendation regarding approval to the faculty-level Finance Approver as well as flagging any issues relevant to the decision of the Finance Approver; and

(b) when the Budget Reviewer has made a recommendation, the Finance Approver (Senior Research Finance Specialist, Faculty Finance Manager or equivalent function) must check whether the budget complies with UCT financial policies and funder rules. The Finance Approver approves the budget when all criteria for approval have been met; whereafter the Final Faculty Approver conducts the final faculty-level review.

(c) The Final Faculty Approver (which would normally be the Dean or the Deputy Dean: Research, or equivalent functionary) is the final sign-off at faculty level.

(iii) Where an application requires sign-off by an authorised institutional signatory, after approval at faculty level, the application must be signed off at institutional level:

(a) As a first step at institutional level, the application must be reviewed administratively by a Legal Advisor to confirm compliance from an RC&I perspective, considering any alerts that have been communicated by the PI, Faculty Finance, the ethics clearance bodies, the Faculty Office or the Dean (or Deputy Dean).

(b) The Legal Advisor must liaise with the researcher regarding any outstanding issues and confirm the final decision for the application, except in instances where – as a result of the nature, type and value of the budget – a higher level of sign off is required in accordance with the Delegation of Authority Limits (GEN002) Schedule C.[25]

(iv) Once final approval has been given, the PI is responsible for submitting the proposal to the funder, except in those cases where institutional submission is required by UCT or by the funder, in which case this will be submitted by the authorised institutional official, usually a Legal Advisor.

[25] Delegation of authorities

(v) If at any stage of the process there are substantial changes to the budget, including additional funding or budget cuts, the application must be referred back to Faculty Finance; and if at any stage of the process there are substantive additional agreements or changes to existing agreements not related to the budget, the changes must be referred to RC&I for processing.

*1.2.2. Contract-stage approval for funding arising for commissioned- or consultancy- or industry-led research, development and services*

(a) In instances in which there was no funding call and the process began with contract negotiations with the funder or sponsor, the contract-stage approval process must be followed using the UCT eRA system.

(b) Seeking approval in this situation must comply with submission in the eRA system. The PI is required to do the following:

(i) Once the intending grantor and the PI have agreed on the scope of the project and the draft budget, it must be submitted via the eRA contract-approval process, which initiates the budget, regulatory and resources review, whereafter the contract review will follow.

(ii) The PI is responsible for accurately declaring which ethics and biosafety clearances are required for the proposed research, as well as which resources are required with confirmation of these resources' availability. Where ethics or biosafety (or any other regulatory) documentation is required by the funder at proposal submission stage, the PI is responsible for obtaining (and attaching to the eRA form) the necessary clearance, approval and/or exemption forms. This entails that the PI must comply with UCT's *Policy for the Responsible Conduct of Research*[26] and must obtain the approvals, as relevant, listed above in section 1.2.1(b) prior to commencing the research.

(iii) The PI must ensure that the envisaged contract research is in line with UCT's *Conflict of Interest Policy*[27] and does not result in either a financial conflict of interest or a conflict of commitment. It is the responsibility of the PI to seek guidance on conflicts of interest prior to entering a contract, if there is any doubt on the matter.

(iv) The Budget Reviewer liaises with the PI to agree the budget and thereafter the faculty-level Finance Approver (Senior Research Finance Specialist, Faculty Finance Manager or equivalent function) must check whether the budget complies with UCT financial policies, including the due-diligence requirements in regard to any possible sub-awardees as set out in Section 1.2.3, and approves it if all criteria

[26] https://www.uct.ac.za/sites/default/files/media/documents/Policy_Responsible_Conduct_Research_March2022.pdf

[27] See here: https://www.uct.ac.za/sites/default/files/content-migration/uct_ac_za/39/files/Policy_Conflict-Disclosure_Interest_2014-12pdf
(Note: the Conflicts of Interest Policy is currently being revised)

for approval have been met; whereafter the Final Faculty Approver conducts the final faculty-level review..

(v) The Final Faculty Approver (which would normally be the Dean or the Deputy Dean: Research, or equivalent functionary) is the final sign-off at faculty level.

(c) Once the budget, regulatory and resources approval has been completed by the faculty and the draft contract has been uploaded, the pre-awards record is routed to RC&I on eRA at which stage the agreement is assigned to a Legal Advisor to review the contract and to negotiate any problematic clauses with the contractual partner. The RC&I Legal Advisor must liaise with the researcher regarding any outstanding issues and ensure that the contract is signed off in accordance with the Delegation of Authority Limits (GEN002) Schedule C[28]. A signed copy of the contract shall be uploaded to eRA.

*1.2.3 Direct approval of certain contracts*

Certain research-related contracts can be approved by RC&I without the requirement to create and obtain faculty-level approval of a pre-award record on eRA. Examples of contracts regarding which RC&I may decide to give direct approval are:

(i) non-disclosure agreements (NDAs), where a researcher wishes to share a new process, unpublished data, or other confidential information and wishes to protect his or her intellectual property rights; or where a potential funder or client wishes to share confidential information;
(ii) standard analysis contracts, where a researcher carries out routine analysis on products or compounds, where the cost recovery has been pre-approved by faculty, in accordance with an annually updated pricing template, vetted by Faculty Finance to ensure that these contracts are fully costed;
(iii) material transfer agreements (MTAs);
(iv) data-sharing/ transfer agreements (DSAs/ DTAs);
(v) subcontracts and subgrants from UCT to other organisations; and
(vi) any other contracts in respect of which RC&I deem the pre-award eRA process not to be required.

In all such instances RC&I must ensure that the appropriate legal obligations are complied with. When in doubt, researchers are encouraged to consult with RC&I to determine whether the particular contract is of the kind for which direct approval can be given.

*1.2.4 Responding to due diligence questionnaires in regard to UCT's financial and ethics and/or integrity policies, as well as its financial and general administrative ability by funders or contractual partners*

Whenever a funder requires a Principal Investigator (PI) or the University to provide information relating to UCT's financial, ethical, governance, compliance or institutional

[28] Delegation of authorities

control environment, the process will be coordinated centrally. The PI must forward the relevant questionnaire or request to RC&I.

RC&I will coordinate completion of the questionnaire in consultation with the relevant Professional, Administrative and Support Services (PASS) departments, including the International Grants Hub (IGH), Central Research Finance (CRF), the Office of Research Integrity (ORI), Human Resources (HR), and any other relevant units. Responses will be based on official institutional policies, procedures and supporting documentation.

Where required by the funder or University policy, institutional, partner and/or individual due diligence assessments must be completed following notification of an award and before the execution of any sub-award or related agreement. The appropriate due diligence process will be coordinated centrally and may include risk assessments of collaborating institutions, project participants or sub-awardees. Any identified risks must be assessed and managed in accordance with university policies and funder requirements.

CRF will serve as the central coordinating point for subrecipient due diligence activities and will maintain oversight of due diligence outcomes, risk assessments and required management actions in consultation with RC&I and other relevant stakeholders.

A central repository of institutional compliance information and supporting documentation is maintained by the relevant central offices to support efficient completion of these requests.

*1.2.5 Due diligence in regard to subgrantees and contractual partners in research*

UCT, mindful that its obligation to ensure financial and ethical probity in all its research endeavours includes doing its utmost to ensure that any subgrantee of a grant and any subcontractor in a research project also conforms to the funder's requirements and adheres to the standards set by UCT, requires the following measures to be taken:

(a) *Due Diligence in regard to subgrantees and contractual partners in research*

To ensure sound financial management, fiduciary compliance and effective risk management, financial due diligence must ordinarily be performed in respect of subgrantees and collaborating partners before the conclusion of any sub-award, subcontract or collaboration agreement. Where required by a funder, or where RC&I or Central Research Finance (CRF) deems it necessary, due diligence may also be undertaken during the application stage. This entails the following actions:

(i) In all cases where the funder did not perform a due diligence assessment on a sub-awardee, the UCT Due Diligence Questionnaire must be transmitted to the proposed subgrantee or collaborator for completion and for the provision of supporting documentation as indicated in the form. The questionnaire requests documentation (or, in lieu of documentation, a full itemised explanation) from the subgrantee or collaborator in respect of the following aspects of their organisation's financial management: the latest annual financial statements; reporting templates used to monitor the receipt and expenditure of project funds;

conflict of interest policies; policies governing the handling of research-related income and cash receipts; procurement procedures; travel and subsistence procedures; conference, workshop and fieldwork reimbursement procedures; payroll and staff payment controls; policies governing the acquisition, safeguarding and use of equipment; organisational structure and reporting lines; and, where authorised, a summary of the most recent internal or external audit findings.

(ii) Where the primary funder performed a due diligence assessment on the subgrantee during the application stage, UCT will not require another due diligence assessment at contracting stage.

(iii) On receipt of the completed questionnaire, it must be sent to Faculty Finance for review and submission to CRF for final review, and where:
- (a) a subrecipient risk analysis will be undertaken in accordance with the subrecipient risk analysis guidelines set out in Annexure A; and
- (b) Mitigating action, taken in accordance with risk-management principles, in consultation with the relevant faculty authorities and other stakeholders as necessary, will be recommended for inclusion as clause in the sub-agreement.

(iv) Before any sub-award, subcontract or collaboration agreement is concluded, the assessment by Faculty Finance and CRF must be referred to RC&I, where recommended controls and mitigation action is included in the sub-agreement.

(iii) Depending on the confirmed risk rating, the management-control measures may include, but are not limited to, the following:
- (a) regular financial reports that explicitly indicate funds received and expenditure incurred, in the format agreed upon in the contract, together with comparison against the approved budget;
- (b) sign-off by both the PI and the subgrantee's finance officer on each financial report as evidence of compliance with good financial management practice and contractual obligations;
- (c) submission of a narrative report explaining the financial information provided, together with certified supporting documentation where required;
- (d) staged disbursement of funds linked to the satisfactory submission of reports and supporting documentation;
- (e) spend-and-claim funding arrangements;
- (f) increased reporting frequency or enhanced monitoring requirements; and
- (g) any other control measures deemed appropriate based on the assessed level of risk.

UCT may withhold, delay or condition the disbursement of funds where required information has not been submitted or where concerns exist regarding compliance with contractual, financial or funder requirements.

(iv) A subgrantee or subcontractor is held to the same standards/requirements in regard to which UCT is accountable to the funder, and therefore, should the answers of the subgrantee to the due diligence questionnaire pass muster, the subgrantee must sign a subgrantee contract which spells out their technical and financial management deliverables. This contract obliges the subgrantee to supply the prescribed documents to support the disbursement of funds.

*(c) Due diligence in regard to ethics and related matters on subgrantees and contractual partners in research*

(i) A subgrantee or subcontractor is held to the same standards/requirements to which UCT is accountable to the funder, and therefore, should the answers of the subgrantee to the financial management questionnaire pass muster, the subgrantee must sign a subgrantee contract which spells out their technical and financial management deliverables. This contract obliges the subgrantee to supply the prescribed documents to support the disbursement of funds.

(ii) When answering questions posed by funders about how UCT ensures and monitors compliance with ethical and other relevant requirements on the part of subgrantees (which is dealt with centrally as set out in section 1.2.4), it is indicated that this is achieved through the PI. The PI carries primary responsibility for the research project's compliance with the funder's requirements, applicable laws and regulations, as well as institutional policy governing the conduct of sponsored research. In executing the research project, the PI is responsible for ensuring that all reasonable measures are put in place to monitor, manage and promote ongoing compliance by members of the project (including subgrantees and subcontractors) to adhere to all ethical and other relevant obligations.

(iii) The PI must therefore consider which risks may be entailed in the project, other than those automatically covered in the contract and highlighted through the eRA system, and alert the relevant Legal Advisor for appropriate steps to be taken to mitigate the risk.

(iv) In all cases, except where UCT has sufficient knowledge of an intended subgrantee or contractual partner's ethical values and standards, the Legal Advisor responsible for the conclusion of the sub-award or collaboration contract must incorporate by reference the principles of the *UCT Supplier Code of Conduct*[29] and require affirmation that that the intended subgrantee or contractual partner will comply with the code.

The code sets out the ethical values, standards, principles and guidelines which

[29] https://uct.ac.za/sites/default/files/media/documents/Supplier_Code_of_Conduct_June_2019.pdf

bind all who have dealings with the University and covers the following aspects: adherence to competition law, respecting the privacy of data subjects, engaging in ethical dealings in contracting and making appointments, non-violation of UCT's anti-bribery policies and the laws combating bribery; the impermissibility of giving or receiving gifts beyond the strict limits set by UCT; disclosure of any situation that is or appears to constitute a conflict of interest; the provision of a safe and healthy work environment as well as compliance with all statutory health and safety legislation; compliance with economic and trade sanctions and embargo programmes and non-engagement in any transaction or conduct that directly or indirectly involves embargoed countries, companies or individuals; respect for human rights, including labour rights (which include, but are not limited to the protection of internationally proclaimed human rights, not being complicit in human rights abuses such as use of forced and compulsory labour nor require any worker whether local or foreign to remain in employment for any period of time against his or her will and the provision of equal opportunities and a prohibition of all forms of unfair discrimination); paying of wages and providing benefits at an appropriate level and adhering to legislated or union-agreed working hours; preferably having a whistle-blowing and grievance mechanisms in place; compliance with environmental legislation and sharing UCT's commitment to strive to innovate and adopt best practice in working towards sustainability; the ability to identify all the potential sources of primary origin and to create full supply-chain mapping back to origin to facilitate assessment of upstream supply-chain compliance; compliance with the UCT rules regarding purchase orders; obtaining all permits, licences, returns and authorisations required for carrying out any task; compliance with tax laws; the maintenance of accurate and reliable financial records; and a commitment to disclose any information relating to fraudulent conduct, unethical behaviour, crime and misconduct.

(v) With specific reference to conflicts of interest, the PI must always adhere to all the obligations, including specifically the obligations that are relevant to the research enterprise, imposed by the UCT *Conflicts of Interest Policy*.[30]

(vi) Where required by a funder or institutional policy, individual due diligence assessments may be required for investigators, project staff, sub-award personnel or other individuals participating in the research project. Such assessments may include declarations relating to compliance with institutional policies, ethical conduct, misconduct investigations, safeguarding requirements, harassment and bullying prevention measures, or other matters specified by the

[30] See here: http://www.uct.ac.za/sites/default/files/image_tool/images/328/about/policies/Policy_Conflict_Disclosure_Interest_2014-12.pdf

funder. The administration of such assessments will be coordinated through the centrally managed due diligence process described in section 1.2.4.

1.3 Contract finalisation and initiation of the Post-Award module of eRA

If the grant is awarded, a contract is generated. RC&I is responsible for negotiating and authorising all research-related contracts with external parties on behalf of the University of Cape Town. Once the contract has been finalised, processed and signed by RC&I, the responsible Legal Advisor initiates the Post-Awards Process in eRA.

## B. POST-AWARD

The post-award phase begins once the legal agreement has been fully executed by all parties and the project record is activated in eRA by RC&I.

### SETTING UP AND MANAGING THE AWARD DURING THE DURATION OF THE AWARD

As the person with primary responsibility for the administration of the research grant/ contract, the PI must understand their responsibilities and duties for funds held in UCT's name and at all times be mindful of complying with the applicable UCT policies and procedures, the funder's requirements and the relevant national and international laws and regulations.

2.1 Research contract obligations and fund stewardship

(a) Signing a research project's legal agreement binds UCT to the funder's terms and conditions, including financial and audit requirements. The PI must review the agreement and the applicable funder guidelines to ensure that key milestones, deliverables and payment schedules are clearly understood and complied with. Assistance with financial obligations must be sought from Faculty Finance staff, while questions regarding contractual terms must be directed to Research Contracts & Innovation (RC&I).

(b) All funding agreements are concluded between UCT and the funder, not between the individual Principal Investigator (PI) and the funder. Research funds are therefore held in the name of UCT and must be managed in accordance with institutional policies and the terms and conditions of the relevant funding agreement.

(c) UCT's *Policy GEN001: Funds Held by UCT* outlines the custodianship, ownership and appropriate use of funds. This policy must be reviewed, and its provisions adhered to in the administration of all research funding.

(d) Financial activities must be conducted with appropriate authorisation, transparency and alignment to the approved project budget and funder stipulations.

2.2 Project setup and fund activation

(a) UCT utilises SAP software to manage the financial and HR aspects of its research projects. Proper project setup is essential to ensure compliance and smooth financial and administrative management throughout the research project. When setting up a research project, the PI should consider the activation of research funds in SAP, confirmation of budget availability, and, where applicable, the investment of surplus funds.

(b) Opening a SAP fund

All research project activity must be linked to a SAP fund, which records project-specific income and expenditure and is usually tied to a single source of funding.

- Faculty Finance must be consulted to confirm whether an appropriate SAP fund already exists.
- If a new fund is required, Faculty Finance will initiate the process and notify the relevant parties once the SAP fund has been created.

(c) Budget availability

Before expenditure can begin, available budget must be reflected in the SAP research fund. The mechanism for budget availability depends on the funder agreement:

- *Invoicing:* Budget is available after invoicing the funder.
- *Spend and Claim:* Spend happens in advance of the invoice and budget is manually loaded into the SAP fund based on the contract.

**NB:** Principal Investigators (PIs) are encouraged to negotiate payment terms that provide for an upfront payment upon finalisation of the agreement, followed by invoicing linked to the achievement of specific deliverables. This approach ensures that PIs have sufficient funds to initiate project activities while also supporting the university in maintaining a healthy cash flow.

Once budget has been loaded, this will be reflected in the "Budget Information" tab of the Contracts module in eRA. The PI should consult Faculty Finance to confirm which model applies to the project.

(d) Investment of surplus funds

Where permitted by the funder, surplus funds received in advance may be invested, provided that the fund is not in deficit (i.e. where expenditure exceeds funds received). Only actual funds received may be invested.

Investment is typically made in Portfolio 3, which allows for monthly withdrawals.

Faculty Finance must be consulted to confirm funder eligibility and to provide assistance with the investment process. Reference must be made to *UCT's policy on Investment Portfolios.*

## 2.3 Project Management

The PI is responsible for monitoring the research project against the approved workplan, budget and contractual obligations. Failure to meet key milestones or manage expenditure appropriately may result in project delays, financial penalties, recovery of funds by the funder, escalation to Faculty Deans or other senior leadership and reputational risk to both the PI and the University. The PI must do the following for the duration of the research project:

### *2.3.1 Financial management*

Roles, responsibilities and support

(a) The PI must ensure that the applicable UCT finance policies[31] are adhered to. The PI is assisted in this task by the applicable faculty-level finance staff and, where appropriate, by the staff of the Central Research Finance management. Training modules are provided by the International Grants Hub (IGH), the Researcher Development Academy team (RDA) and Central Research Finance (CRF) staff where required.

(b) In order to fulfil this obligation, PIs are should make use post-award module of the eRA system, which is designed to support PIs and their staff to manage the administration of research throughout a project lifecycle, by keeping track of financial activities linked to the research project award, such as invoices or receipts issued and budget loading requests.[32]

(c) Central Research Finance (CRF) in the Research Finance Department has overall responsibility to oversee financial management of research projects by ensuring that reports, controls and other risk management measures across UCT remain appropriate and to ensure the financial integrity of such projects, a function which it fulfils in close cooperation with Faculty finance and central finance units.

Budget oversight and cashflow management

(d) The PI must convert the approved UCT and funder budget into a working cash flow plan that aligns with the research plan and anticipated funding milestones. Budget reviews must be conducted regularly to reflect changes in project scope, timelines, or funder payments.

(e) Cash inflows and outflows must be monitored to avoid funding shortfalls, particularly in cases where final payments are subject to deliverables or reporting. Poor budget management may lead to overspending, underspending, or financial non-compliance,

[31] http://www.staff.uct.ac.za/staff/finance/operations/policies-guidelines
[32] For details, click here: http://www.researchsupport.uct.ac.za/era-post-awards#post-awards-how-to

which could result in penalties or funder clawbacks. Refer to UCT's *Policy on Deficit Fund Management* for governance and reporting on deficit funds.

Use of financial systems and reports

(f) UCT's financial systems, including SAP, Business Objects (BOBJ), Research Finance Gate (RFG) and PowerBI, can be used to track and manage financial performance.

(g) The PI, supported by Faculty Finance must regularly provide appropriate financial report statements at a level of detail and frequency that is commensurate with the amount of funding and the funder requirements. These financial reports must be signed off Faculty Finance.

(h) SAP serves as the authoritative source of financial records; all transactions must be reconciled accordingly. Faculty Finance can support with this process.

Invoicing and income management

(i) Invoices must be issued in accordance with the terms of the funding agreement and only via SAP, using the appropriate forms:
- *SD006*: to request payment; and
- *SD007*: to raise an invoice for funds already received.

Before issuing an invoice, all contractual obligations must be met as payments are typically due within 30 days of invoicing.

(j) The PI must support Faculty Finance and the Debtors Department in preparing documentation, tracking payments and following up on delayed receipts where required.

Procurement and purchasing

(k) In the procurement of equipment or any other goods associated with the research project, the PI must adhere to the terms of the grant and all the UCT policies governing procurement, including:
- *Property, Plant and Equipment (Assets) Acquisition Policy*
- *Policy on Delegated Authority Limits*
- *Process and the Procedure for the Import and Export of Goods*[33]
- *P-Card Compliance Policy* Practice Note.[34]

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[33] All these policies and procedures are available here: http://www.staff.uct.ac.za/staff/finance/procurement/policies-guidelines

[34] This document is available here: http://www.staff.uct.ac.za/sites/default/files/image_tool/images/431/finance/operations/policies/practice_notes/pur009.pdf

- *Purchasing Threshold Policy*
- *Quotations, Tenders and RFPs Policy*

Purchases may be made via a Purchase Order (PO) or P-Card, depending on the nature of the item and the threshold.

(l) For foreign procurements, the Foreign Payments Office must be consulted for guidance and compliance.

(m) In respect of disbursements associated with travel connected to the research project, the PI must be familiar with and implement faithfully UCT's Subsistence and Travel Policy[35] as well as the Mileage Policy.[36]

Payments to sub-awardees and partners

(n) In respect of payments to sub-awardees, consortium partners, or subcontractors, the PI must ensure that all agreed deliverables have been met prior to initiating payment. Faculty Finance must review the supporting documentation and confirm compliance before processing the payment. It is considered best practice to maintain a payment schedule that tracks deliverables, payment terms and alignment with the approved budget.

Timesheets and effort reporting

(o) The PI is responsible for keeping timesheets, or alternative documentary evidence of the actual work undertaken by staff working on the research project to ensure correct expenditure allocation. Where the Funder stipulates a particular format and content for the timesheets, the PI must adhere to the stipulations and ensure that the timesheets are appropriately authorised and retained for audit purposes.

Exchange rate risk management

(p) In respect of projects involving foreign currency, the PI must monitor and manage exchange rate risks that may impact budgeting, income, procurement, or reporting. Faculty Finance must be consulted to assist with mitigating these risks. The PI must also refer to UCT's Foreign Exchange Risk Management (FERM) Guidelines for detailed guidance.

Tax compliance

[35] The S&T Policy is available here: https://www.uct.ac.za/sites/default/files/content_migration/uct_ac_za/48/files/pay002.pdf

[36] The Mileage Policy is available here: https://www.uct.ac.za/staff/finance-finance-operations/policies-and-guidelines

(q) Research Contracts & Innovation (RC&I) determine the VAT classification of the research project using the VAT decision tree to ensure compliance with applicable SARS regulations. As the VAT status is assigned during SAP fund setup and cannot be amended thereafter, it is essential that the nature of the research activity is accurately classified at the outset.

(r) All payments for services rendered must be processed through SAP HR Payroll to ensure compliance with tax legislation, except in cases where payments are explicitly excluded, such as reimbursements or subsistence allowances.

(s) For projects involving Postdoctoral Fellows, the PI must consult the Postgraduate Funding Office (PGFO) to confirm tax obligations and manage any specific tax risks associated with Postdocs.

### *2.3.2 General project management*

Personnel management

(a) The Principal Investigator (PI) is responsible for recruiting, managing, and compensating research staff in accordance with UCT policies and the terms of the funding agreement. When making appointments in respect of the research project, the PI must at all times adhere to UCT's policies relating to recruitment[37] as well as to any funder requirements in respect of recruitment captured in the contract. Appointments must be made in an ethical way by adhering to all relevant policies set out in Section 2.3.3. All staffing requirements must be planned in consultation with the relevant Faculty Human Resources Business Partner (HRBP) and Faculty Finance. It is the responsibility of the PI to prepare position descriptions for all roles, with support available from the HRBP to adapt generic templates or develop new descriptions as needed. The term of employment must align with the duration of the legal agreement with the funder and will determine the applicable conditions of service.

(b) All remuneration must be processed through UCT's HR payroll system; alternative payment methods are not permitted. Salaries must align with the approved project budget and funder requirements, including any applicable salary caps. Where staff are appointed across multiple projects, appropriate cost allocations must be managed in consultation with Faculty Finance. Where required by the funder, time and effort tracking must be maintained using authorised templates.

[37] The recruitment policies are available here: http://www.hr.uct.ac.za/hr/recruitment/policies

(c) The PI must provide effective leadership and oversight of the project team, ensuring clear roles, accountability and appropriate support throughout the project.

Research compliance and safety

(d) The PI is responsible for obtaining all permits, licences, returns and authorisations required for carrying out the research.

(e) The PI is responsible for a safe and healthy work environment and compliance with all UCT's Health and Safety Policy[38] as well as health and safety legislation.

Asset management

(f) The PI is responsible, in so far as he or she has direct control of equipment, to keep the equipment in good order. Good practice includes setting up an asset register for all purchases, maintaining detailed and regularly updated usage logs, implementing maintenance and servicing schedules and addressing any issues or damages without delay. The PI must also familiarise themselves with and adhere to the funder's asset management guidelines.

Research Data Management

(g) The data generated by the research project must be dealt with in accordance with UCT's *Research Data Management Policy*,[39] which recognises that publicly funded research is a public good which is aimed at ensuring consistent research practice related to data management principles that support effective data sharing, including open access; and the need for data to be discoverable, accessible, reusable and interoperable to specific quality standards.

(h) Where a funder requires it, a PI must have or create a research-data management plan, and where it is not a requirement of the funder, is strongly encouraged to do so, as this is an important mechanism that assists researchers with the efficient handling of data, acting in an ethically responsible and transparent way in carrying out the research, as well as complying with the *Research Data Management Policy*[40] and related policies, and receiving appropriate recognition. A DMP is a living document, outlining how research

[38] Available here: https://uct.ac.za/sites/default/files/content_migration/uct_ac_za/39/files/STY_Policy_Health_Safety_2020.pdf

[39] Available here: http://www.uct.ac.za/sites/default/files/image_tool/images/328/about/policies/TGO_Policy_Research_Data_Management_2018.pdf

[40] Available here: https://www.uct.ac.za/sites/default/files/content_migration/uct_ac_za/39/files/TGO_Policy_Research_Data_Management_2018.pdf

data will be managed across the project lifecycle, from collection and storage to sharing and long-term preservation. The DMP must be updated as the project evolves to reflect changes in methodology, data types, storage solutions, or publication plans. Good Research Data Management (RDM) practices must be followed to ensure data is well-organised, secure and reusable. These include using appropriate file formats, maintaining clear documentation, implementing secure storage with appropriate backups and planning for data sharing and archiving. The DMP should align with the FAIR principles, ensuring data is Findable, Accessible, Interoperable, and Reusable to maximise the impact, accessibility, and integrity of the research.

(i) The PI is responsible for ensuring that research data and associated systems are stored, accessed and shared in compliance with relevant data protection, privacy and information security requirements. This includes adherence to the terms of the funding agreement and the following UCT policies:

- *Privacy and Data Protection Policy (Interim)*
- *Information Security Policy*
- *Cyber Insurance Policy*

Reporting

(j) The PI is responsible for submitting periodic technical and financial reports on the progress of the research project in accordance with the requirements set out in the funding agreement. Faculty Finance supports the PI in the preparation and review of financial reports and must sign off on all financial reports prior to submission; however, overall accountability for the accuracy, completeness and timely submission of both technical and financial reports rests with the PI. Funders typically provide a standard financial reporting template, which must be used where applicable. All reports must also comply with UCT's internal reporting requirements and deadlines. Timely submission of reports is essential to ensure continued funding and to avoid penalties, funding delays or reputational risks associated with non-compliance.
Research outputs

(k) Research may result in publication or creative outputs, which may in turn be protectable intellectual property (IP). All researchers doing research at UCT have rights and obligations in terms of UCT's *Intellectual Property Policy*[41] and all researchers, whether employees, students or visitors, must observe the obligations of record keeping, disclosure (including specifically the disclosure of inventions to RC&I within 90 days of the discovery of the invention), maintaining confidentiality, and co-operation with RC&I in observing the

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41 https://www.uct.ac.za/sites/default/files/content_migration/uct_ac_za/39/files/Policy_Intellectual_Property_2011.pdf

requirements of the Intellectual Property Rights from Publicly Financed Research and Development Act 51 of 2008 (the "IPR Act"), the National Environmental Management: Biodiversity Act 10 of 2004, and exchange control regulations and achieving the appropriate IP protection.

(l) When generating publications from the research project, the PI and all researchers involved in the project must observe the *Authorship Practices Policy*.[42]

*2.3.3 Adherence to ethical imperatives*

(a) The PI and all researchers must at all times act in an ethical manner when conducting the research associated with the project and in all dealings related to the research project and must ensure that the principles contained in the *Policy for the Responsible Conduct of Research*[43] are adhered to in the execution of the research, including, where relevant, the Addendum entitled 'Restitution Statement'; and also, as and where relevant, that the principles contained in related policies are observed, including but not limited to, the *Research Ethics Code for Research Involving Human Participants*,[44] the *Research Ethics Code for Use of Animals in Research and Teaching*,[45] and policies and procedures set out below in paragraphs (b) – (d) below.

(b) The PI must always respect the privacy of data subjects, prevent unauthorised access to confidential digital data, records and documents, and keep confidential records and documents secure at all times. The Protection of Personal Information Act (POPIA) compels all institutions to take particular care in preserving the confidentiality of personal information and the PIs is required to familiarise themselves with, and adhere to, the UCT *Information Security Policy*,[46] and the *Record Management Policy*.[47]

(c) In regard to all dealings necessary to carry out the research project, including appointing staff, the PI is required to observe UCT's policies aimed at preventing fraud and corruption, including the *Policy on Fraud and Corruption Prevention*[48] and the *Conflict of Interest*

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[42] https://www.uct.ac.za/sites/default/files/content_migration/uct_ac_za/39/files/Policy_Authorship_Practices.pdf

[43] https://www.uct.ac.za/sites/default/files/media/documents/Policy_Responsible_Conduct_Research_March2022.pdf

[44] https://www.uct.ac.za/sites/default/files/content_migration/uct_ac_za/39/files/Human_Research_Ethics_Code_2012.pdf

[45] https://www.uct.ac.za/sites/default/files/content_migration/uct_ac_za/39/files/Animal_Research_Ethics_Code_2-12.pdf

[46] https://www.icts.uct.ac.za/sits/default/files/content_migration/icts/_uct_ac_za/66/files/UCT_Information_Security_Policy_PC03_2020.pdf

[47] https://www.uct.ac.za/sites/default/files/content_migration/uct_ac_za/39/files/REG_Policy_Records_Management_2012.pdf

[48] The UCT Policy on the Fraud and Corruption Prevention can be found here: https://www.uct.ac.za/sites/default/files/media/documents/gen005_2022.pdf

*Policy*.[49] When in doubt, the PI is advised to consult the office of the Director of the Office of Research Integrity (ORI).

(d) If at any stage there is an allegation of a breach of research ethics or other research misconduct, the prescriptions of the *Policy and Procedures for Breach of Research Ethics and Allegations of Misconduct in Research*[50] will be followed.

## 2.4 Project Close Out

### *2.4.1 Reporting*

When the project is complete, the PI is required to complete the reporting on the project (both financial and technical) as specified by the funder.

### *1.4.2 Audits and record keeping*

(a) Funders may audit the research project at any stage, during or after completion, to verify compliance and confirm the accuracy of financial and technical reporting. The PI must understand the funder's audit requirements from the outset and ensure that accurate records and supporting documentation are maintained throughout the project.

(b) If an audit is required, an auditor must be appointed before the project end date. Auditor appointments are managed by Central Research Finance (CRF) in accordance with UCT's procurement policy. Faculty finance must be notified in advance to initiate the process.

(c) eRA must be updated with all relevant audit information, including the audit type, date(s), auditor name(s), affiliation and scope. The Research Financial Audit Guideline issued by CRF must be followed to support audit preparation and ensure institutional compliance.

### *1.4.3 Changes to project duration*

(a) The PI must review the contract with the funder for any provisions related to early project termination. In such cases, RC&I must be consulted for legal guidance, and faculty finance must be engaged to address the associated financial implications.

(b) Where additional time is required to complete a project, the PI must consult the funder in advance to determine whether a no-cost extension or variation agreement is possible. A written request must be submitted within the timeframe specified in the funding agreement. RC&I is responsible for managing contract amendments. All extensions require written approval from the funder and are not guaranteed.

### *2.4.4. Financial closure*

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49 https://www.uct.ac.za/sites/default/files/content_migration/uct_ac_za/39/files?Policy_Conflict_Disclosure_Interest_2014-12.pdf

50 https://www.uct.ac.za/sites/default/files/content_migration/uct_ac_za/39/files?Policy_Research_Ethics_Breach_Misconduct_2014.pdf

On financial closure, the PI will follow the procedure for closing a fund by:

- following the close-out process mapped in the UCT eRA system post-award module, and
- completing *UCT administrative form FM007: Application to Close a Fund*,[51] certifying that all matters listed in the checklist have been dealt with as specified.

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[51] This form can be found under UCT Administrative Forms here: https://forms.uct.ac.za/