Grants funding policy updates

ARMA study day
14th May 2019

Joan Saitch - Grants Policies Manager

Kerry Garfitt - Grants Policies and Liaison Officer

Questions?
Go to slido.com and use code #G246

Immigration

We'll cover immigration-related costs to support Wellcome-funded researchers to take up their position of employment on the grant

Visas

We'll cover:

- o application fees
- o essential associated costs (for example, for essential travel)
- o Immigration Health Surcharge

Immigration

Visas costs

- We'll provide these costs for:

  o named researchers whose salaries are funded on our grants; and

  o the researcher's partner and dependants

- Can be requested in grant applications; OR

  can use existing grant funds

- Wellcome Students also eligible for these costs

Immigration

Tier 1 visas

- Accelerated endorsement route extended to Humanities and Social Science (H&SS):
  - Investigator Awards in H&SS
  - University Awards in H&SS

- Categories: Exceptional Talent OR Exceptional Promise, depending on career stage

- 2-stage application process:
  - 1) Endorsement by the Designated Competent Body
  - 2) Immigration visa from UK Home Office

- List of schemes eligible for accelerated endorsement on Wellcome website
https://wellcome.ac.uk/funding/guidance/tier-1-exceptional-talent-visa-route

Grant transfers

Wellcome-funded researchers can now transfer their grants overseas

- No longer restricted to scheme location criterion
- Recognises that researchers are increasingly mobile
- Must be in interest of the research and the people involved
- New policy doesn't apply to:
  - Multi-user Equipment Grants
  - Research Resources Awards in Humanities and Social Science
  - Master's or PhD Programmes

Grant transfers

- New organisation:
  - must be able to sign up to our Grant Conditions
  - cannot be based in a country that's the target of international sanctions

- Other specific eligibility criteria may apply if grant is jointly funded between Wellcome and other funder(s)

- Further details on transfer process available on Wellcome website https://wellcome.ac.uk/funding/guidance/transferring-grant

USS Pension changes

Phased contribution increases from employers and employees from 1 April 2019

- Wellcome will meet the additional employer's contributions on :
  - applications under review when the changes were announced
  - new applications submitted to us

- Applications costed at outline stage before the USS Pension changes announced can be re-costed

Stopping Flexible Funding Allowance

What was it?   2.5%/£50k max for unexpected costs for a small number of Science and H&SS schemes

Why stop it?   Virement policy of 2015 reduced need

We can supplement for major unanticipated events (fire etc)

It was complicated – some schemes had it some didn't

Stopped when? Schemes with deadlines 1 March 2019 or later

Research culture – D&I

Applicants with a disability or chronic health condition

Our policy is:

- No one should face barriers in applying for Wellcome support

- We offer different types of support

- Applicants should contact us as early in the application process as possible

- Support for Wellcome reporting/meetings also available for grantholders

Because:

- Diversity is valuable to research

- Proportion of disabled people in society is much higher than the proportion in academia

Applicants with a disability or chronic health condition

Next steps:

- Considering if Wellcome provide in-grant support to enable grantholders to complete their grant?

(Balancing employer's statutory responsibility and desire to ensure researchers don't miss out)

Parental/sick leave

Applies to:

Aimed for policy that was:

Fair   Transparent   Easily applied

Parental/sick leave

Previously:

- Very few eligible grantholders requested a research cost supplement.
- Why?

  - Didn't know they could?

  - Didn't want to ask?

  - Didn't need it?

So that's why:

- Research costs supplement is automatic* for leave of 1 month+
- No request and no justification required
- Based on research costs awarded, length of grant and length of leave
- Reduces worry

*for sole leads who get their salary from Wellcome

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Grants Assurance

ARMA study day
14th May 2019

Deswell Chitewe
Internal Audit Manager

Questions?
Go to slido.com and use code #G246

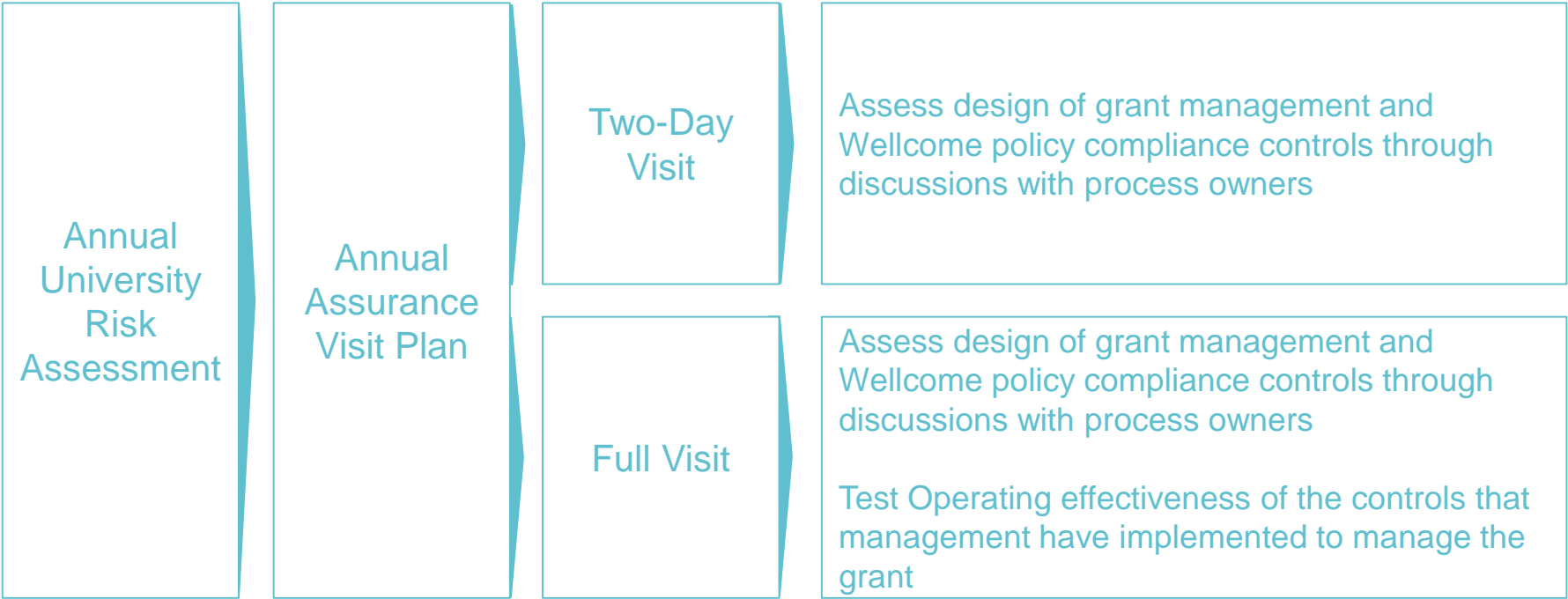# Purpose of University Assurance Visits

To gain assurance that a University has an adequate control environment to ensure that Wellcome grant conditions are met

Our Approach: Moving from testing transactions to testing controls

Post-Award Transaction Testing

Post-Award Grants Management Financial Controls

Pre-Award and **Post- Award** Grants Management Financial Controls

Policy Compliance Controls, **Pre-Award** and **Post Award** Grants Management Financial Controls

Risk based approach

Risk Based Approach

| Annual University Risk Assessment | Annual Assurance Visit Plan | Two-Day Visit | Assess design of grant management and Wellcome policy compliance controls through discussions with process owners |
| | | Full Visit | Assess design of grant management and Wellcome policy compliance controls through discussions with process owners

Test Operating effectiveness of the controls that management have implemented to manage the grant |

Expectations for University Grants Management

Pre-Award & Grant Set-up
PRE-AWARD •Standardised cost rates used salary, access and animal costs •Checks to confirm availability of facilities •Documentation for grant costings maintained •Second person checks grant costings to source •Due diligence on sub-contracts and communication of Wellcome grant conditions GRANT SET-UP •Review/action plan of difference between grant application and award letter •Transition of information from pre-award to post-award •Cost headings in finance system match to award letter •Linked related accounts (e.g. ISSF parent and child accounts)

Expectations for University Grants Management

Post-Award
• Central team sets up a grant financial management framework depicting local vs central review • A procurement policy that ensures value for money and is consistently used • Review and approval of all expenses prior to expenditure • Review of all third party expenditure • Periodic review of grant spend (e.g. monthly including budget vs. actual and exception reporting) • Regular reporting to the PI on expenditure • Regular risk-based and/or management information driven secondary review of expenditure • Regular catch-ups between central and local teams to review grant financials and central teams perform sample checking • Timely response to communication and queries from Wellcome

Expectations for University Grants Management

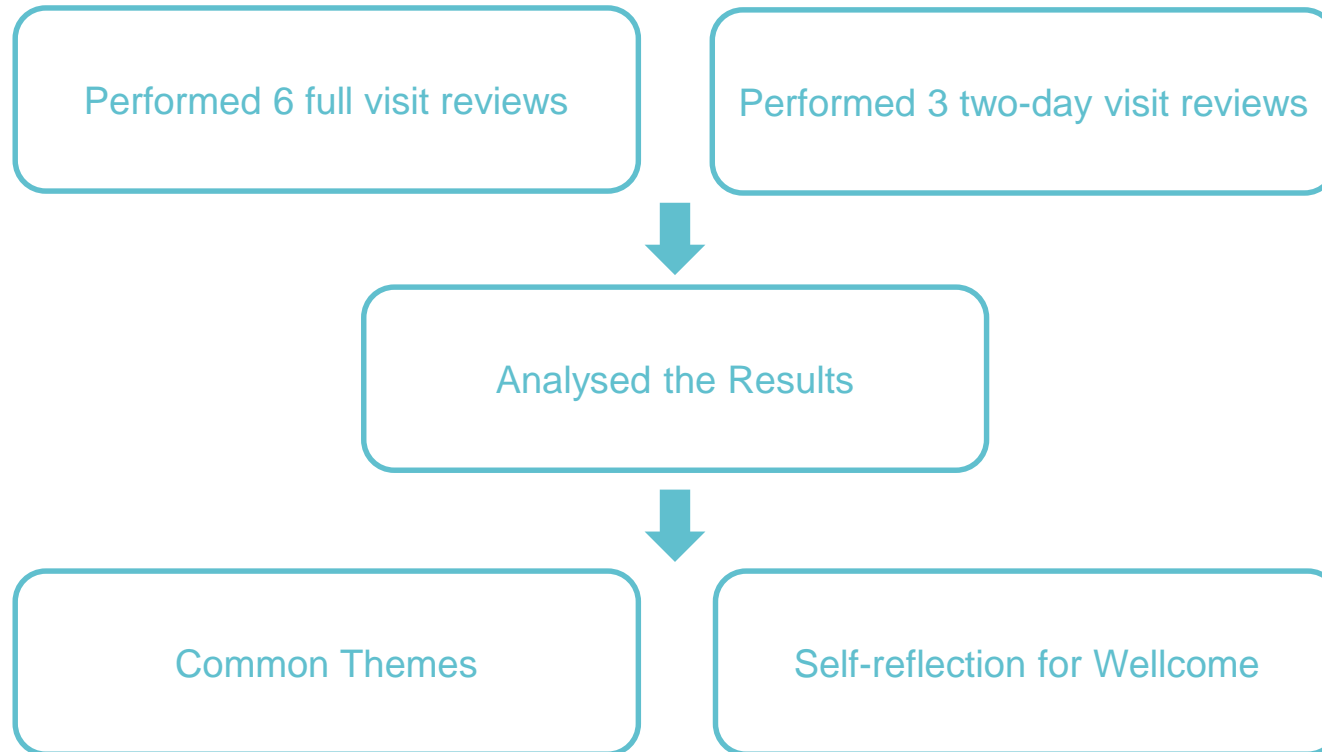| Grant Reporting |
| --- |
| **FINANCIAL**
• Exception reporting review to ensure complete and accurate reporting to Wellcome (e.g. burn rates, %ge journals, variances)
• Processes to ensure timely reporting to Wellcome
• PI review and sign off of expenditure at the end of the grant to confirm the grant met the grant conditions

OTHER
• Adhoc reporting to Wellcome per policies and guidance e.g. upheld cases of research misconduct and bullying and harassment |

Expectations for Policy Compliance Controls

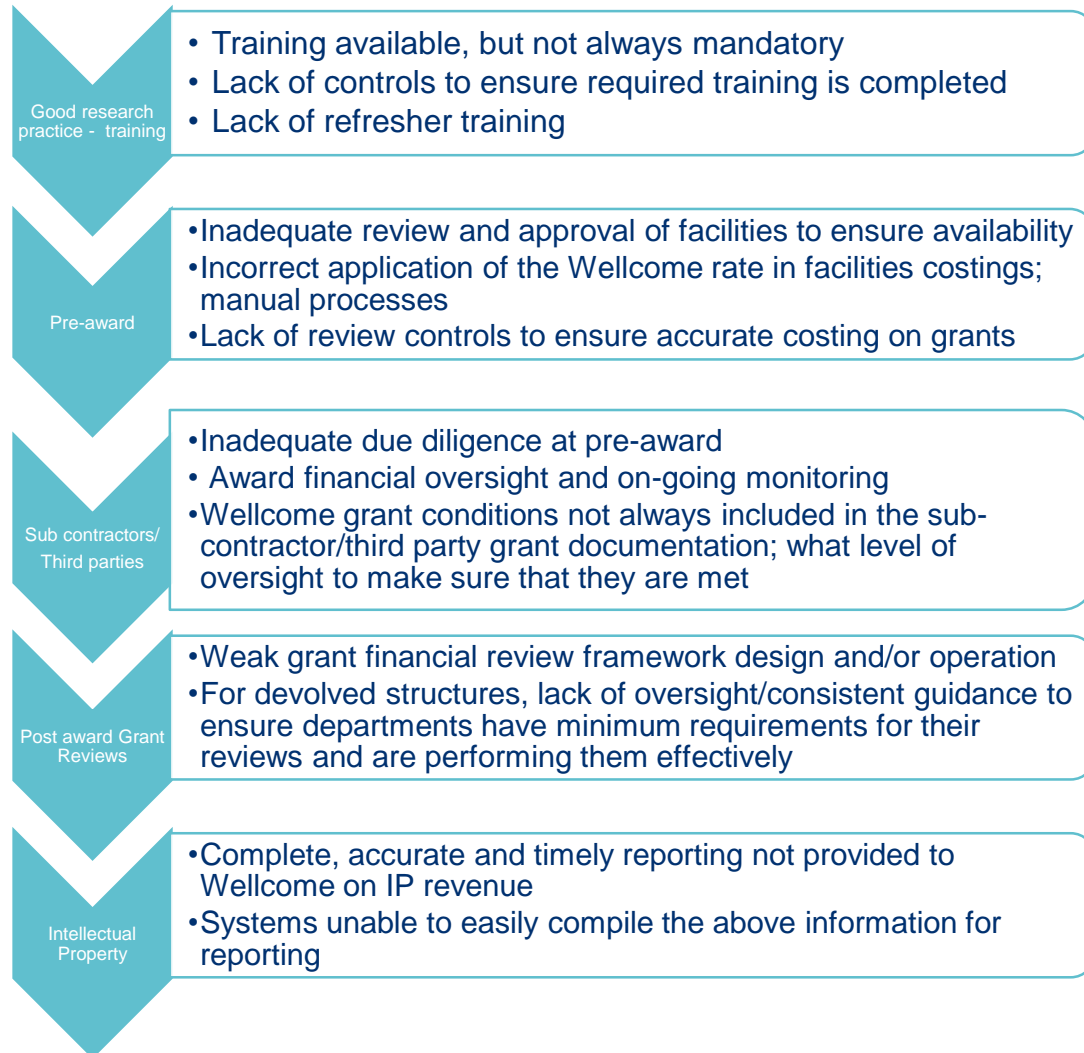| Good Research Practice Policy & Training	Research Misconduct Handling Framework	Anti-Bullying & Harassment
• Policy in place • Training courses provided and tracked • Mandatory training for early career researchers • Refresher training • Experimental data record keeping policy and guidance • Guidance to PIs on managing budgets and grant lifecycle	• Policy in place • Escalation routes defined and communicated • Included in general training • Process for reporting research misconduct cases to Wellcome • Framework for university's Investigation Panel • Training for Investigation Panel members	• Policy in place • Escalation routes defined and communicated • Process for ensuring reporting of upheld allegations to Wellcome at application stage and on-going • Investigation framework with Committee oversight • Training for committee members

Expectations for Policy Compliance Controls

IP Policy & Controls	Monitoring General Compliance with grant conditions	Clinical Trials Registration
• Policy and activity to detect and develop IP from research activities • Dedicated team • System for tracking • Approval from Wellcome as relevant • Revenue reporting to Wellcome • Due diligence on third parties	• PIs are made aware of Wellcome grant conditions • Monitoring of bespoke grant conditions • Inclusion of Wellcome grant conditions in sub-contracts • Financial transaction reviews to identify ineligible spend	• The University is MHRA registered; MHRA inspection reports are retained; actions tracked and followed up • All clinical trials are registered before the first subject receives the first medical intervention in the trial (in line with the Declaration of Helsinki 2013) • If a clinical trial is terminated, status in the registry is updated timely

Progress in last 3 years

Performed 6 full visit reviews

Performed 3 two-day visit reviews

Analysed the Results

Common Themes

Self-reflection for Wellcome

Common Themes from Assurance Visits

University Root Cause Analysis

Good research practice - training

- Training available, but not always mandatory
- Lack of controls to ensure required training is completed
- Lack of refresher training

Training is largely devolved to post-grad training schools; addresses the PhD cohort – but less focus on post-docs, newly appointed lecturers and people joining the university at a later career stage.

Pre-award

- Inadequate review and approval of facilities to ensure availability
- Incorrect application of the Wellcome rate in facilities costings; manual processes
- Lack of review controls to ensure accurate costing on grants

Different funders cover different costs (e.g. direct and indirect); this requires sophisticated models to ensure correct rates.
Quite often the work is done, but its not transparent; and there is no checking, for examples by facilities to ensure they can meet demand.

Sub contractors/ Third parties

- Inadequate due diligence at pre-award
- Award financial oversight and on-going monitoring
- Wellcome grant conditions not always included in the sub-contractor/third party grant documentation; what level of oversight to make sure that they are met

Previously there was less focus on this area but due to recent funding initiatives and more global funding scrutiny has increased. These are new processes as most universities haven't had to deal with this much in the past; mostly dealt with UK universities.

Post award Grant Reviews

- Weak grant financial review framework design and/or operation
- For devolved structures, lack of oversight/consistent guidance to ensure departments have minimum requirements for their reviews and are performing them effectively

Resourcing challenges for the oversight functions.

Intellectual Property

- Complete, accurate and timely reporting not provided to Wellcome on IP revenue
- Systems unable to easily compile the above information for reporting

More focus now on translation and IP; and so these functions and tools are being built up.

Questions

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Questions?

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Application costs

ARMA Study Day

Tuesday 14th May

Common queries

- Ineligible costs
  - Such as bench fees, personal protective equipment, office equipment
  - Refer to our webpage 'Costs grantholders can claim on a grant'

- Salaries
  - Is the salary appropriate for the expertise required?
  - Is the basic salary clear?

- Inclusion of fellowship supplement
  - Fellowship supplements and other additional costs are added by the office

- Changes to costs during the application process

Using the form effectively

- Make full use of the justification section
  - Helpful if a justification is given for each budget category
  - Reduces queries for applicants
  - Clear to Wellcome staff, peer reviewers and our committees

- Break down large sums of money
  - Easier to understand if there is a high level break down within each budget category

Materials and consumables

Description	Total (£)
Sequencing, Antibodies, genotyping	410,000
Consumables	480,000

❌

Materials and consumables

Description	Total (£)
Protein biochemistry consumables: includes complement proteins, small equipment, disposable tubes, dishes, pipette tips, chromatography columns and resin etc)	80,000
Tissue culture consumables	90,000
Molecular biology consumables	15,000
General lab chemicals consumables	30,000
Lipid and detergent consumables	30,000
CryoEM consumables	30,000

✔️

Research management and support costs

- These costs are eligible if…
  - Your host organisation is in an LMIC and the grant will be directly awarded
  - Part of the grant will be sub-contracted to an organisation in an LMIC

- Total research management cost < 20% of the direct research costs

- You must:
  - give a full breakdown of costs (a percentage isn't detailed enough)
  - fully justify these costs
  - include a letter from the finance director of the organisation
    - confirmation that the breakdown is a true representation of the costs incurred