

Policy Title	COLLEGE INVESTIGATOR ELIGIBILITY POLICY
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1. INTRODUCTION

1.1 Description

Application: This policy applies to all proposals for externally funded research grants and contracts.¹

Exceptions: Applications for exceptions to this policy should be made through the Faculty Dean.

1.2 Aims

To outline College policy governing the eligibility of principal investigators and co-investigators who apply for externally funded research (or enter into related agreements) where there are no prevailing funder eligibility criteria.

It is important to note that applying strict eligibility criteria on the basis of employment (e.g. fixed term versus permanent), over and above any conditions imposed by external funders, risks exposing the College to charges of unequal treatment under the Fixed Term Employees (Prevention of Less Favourable Treatment) Regulations 2002.²

2. DEFINITIONS

2.1 Principal Investigator (PI) / Lead Applicant

The person to whom the research project is awarded. As such, the PI takes responsibility for the intellectual leadership of the research project and overall scientific and financial management of the research.

2.2 Co-Investigator (Co-I) / Co-Applicant

A person who makes a substantial contribution to the formulation and development of the proposal and will be closely involved with the project if funded. Co-Is are normally expected to meet the same eligibility criteria as the PI and should be able to take over from the PI if required.

2.3 Researcher Co-Investigator

Researcher co-investigators are post-doctoral researchers who make a substantial contribution to the formulation and development of the proposal and will be closely involved with the funded project. A researcher co-investigator may not take over from the PI. Not all Funders will recognise the category of researcher co-investigator, so their inclusion in proposals may be restricted.

¹ Research activity is defined at <https://www.imperial.ac.uk/research-and-innovation/research-office/research-policies/what-counts-as-research/>

² Further information available at <https://www.imperial.ac.uk/human-resources/procedures/fixed-term-workers/faqs/>

3. PRINCIPLES GOVERNING THE ELIGIBILITY OF PRINCIPAL AND CO-INVESTIGATORS WHEN APPLYING FOR RESEARCH FUNDING OR ENTERING INTO RELATED AGREEMENTS

- 3.1 All applications for research funding are subject to the principles and obligations stated within the [Proposal Development & Bid Management Policy](#) and [Approval & Institutional Authorisation Policy](#) and must meet the agreed [definition of research](#).
- 3.2 Where funders state investigator eligibility criteria for specific funding schemes (which may include requirements governing minimum qualifications, academic grade etc), these will take precedence over College policy for that scheme only.
- 3.3 Where no minimum eligibility requirements are stated by a funder, then College policy will determine the criteria.
- 3.4 There are no restrictions to Investigator eligibility based on:
 - 3.4.1 Types of employment contract: This means that researchers supported on open-ended or fixed-term contracts may act as PI and may request funds for their own salary (e.g. a fellowship applicant may be named as the PI) provided that they meet defined funder eligibility criteria.
 - 3.4.2 The investigator's source of salary funding (whether institutionally or externally funded) providing that:
 - a. the funder to which the new proposal is to be submitted has placed no restrictions on the source of investigator salary funding.
 - b. where the investigator's salary is met through external funds, the commitment outlined within the new proposal is acceptable to that funder, or such funds will be relinquished if the proposal is successful.
- 3.5 The College is not obliged to accept awards or offers of research funding if failure to comply with the [Approval and Authorisation Policy](#) results in the College's inability to support the research. This includes, but is not limited to, any change of circumstances that may arise during the period between application and award.
- 3.6 The College's approval procedures for staff recruitment, appointment and promotion will govern institutional application of salary funding.

4. IMPERIAL ELIGIBILITY CRITERIA FOR PRINCIPAL INVESTIGATORS

GOVERNING PRINCIPLES

Where a Funder states Investigator eligibility criteria for specific funding schemes (which may include requirements governing minimum qualifications, academic grade etc), these will take precedence over College policy for that scheme only.

Where no minimum eligibility requirements are stated by a Funder, then College policy will determine the criteria.

Employment Status

- 4.1 To allow for appropriate management, infrastructure support and proper research governance, the PI / lead applicant must be either:
- a) employed by the College or ensure another alternative formal arrangement is in place at the time of application (such as a secondment); OR
 - b) scheduled to move to the College before the proposed start date of the project; OR
 - c) subject to an agreement that makes arrangements in line with (a) or (b) above, which must be enacted by the time the research project starts.
- 4.2 In order to fulfil funder reporting requirements, the PI / lead applicant's contract of employment (or other formal arrangement) must extend beyond the end date of the project, or an agreement must be put in place by the time the research project starts.
- 4.3 If the end of the contract of employment is equal to the end date of the project, the application should be submitted jointly with at least one established Co-I from the same department to provide continuity of project management. The named Co-I will assume responsibility for submission of the final scientific report and the management all other related obligations in the event that the PI is unable to do so and/or is no longer employed by Imperial.
- 4.4 Where the PI is expected to retire before the end of a project, the proposal must specify which Co-I will assume responsibility for the project at the point of the PI's retirement.

Academic Standing / Qualifications

4.5 Faculties of Engineering, Medicine and Natural Sciences:

In addition to having suitable qualifications and experience within the field of research for which an application for funding is submitted, at the time of application the proposed PI should:

- a) Hold a graduate degree, although a PI would normally be expected to hold a PhD/DPhil/MD or equivalent.
- b) Hold an academic or research post (or equivalent if all other academic criteria are met).
- c) Normally demonstrate at least 5 years postdoctoral (or equivalent) research experience (full-time equivalent) when leading contracts (commercial funding), with exception for fellowships.
- d) Normally demonstrate at least 3 years postdoctoral (or equivalent) research experience (full-time equivalent) when leading grant applications (non-commercial funding), with exception for fellowships.

4.6 Business School:

In addition to having suitable qualifications and experience within the field of research for which an application for funding is submitted, at the time of application the proposed Principal Investigator (PI) from the Business School should:

- a) Hold a graduate degree, although a PI would normally be expected to hold a PhD/DPhil/MD or equivalent.
- b) Hold an academic or research post (or equivalent if all other academic criteria are met).
- c) Normally demonstrate at least 2 years postdoctoral (or equivalent) research experience (full-time equivalent) when leading contracts (commercial funding), with exception for fellowships.
- d) No minimum period of postdoctoral (or equivalent) experience is required for PIs within the Business School when leading grant applications (non-commercial funding).

5. IMPERIAL ELIGIBILITY CRITERIA FOR CO-INVESTIGATORS

GOVERNING PRINCIPLES

Where a Funder states Investigator eligibility criteria for specific funding schemes (which may include requirements governing minimum qualifications, academic grade etc), these will take precedence over College policy for that scheme only.

Where no minimum eligibility requirements are stated by a Funder, then College policy will determine the criteria.

Employment Status

- 5.1 To allow for appropriate management, infrastructure support and proper research governance, the Co-I / Co-applicant must be either:
 - a) employed by the College at the time of application or ensures another alternative formal arrangement is in place at the time of application (such as secondment); OR
 - b) scheduled to move to the College before the proposed start date of the project; OR
 - c) subject to an agreement that makes arrangements in line with (a) or (b) above, which must be enacted by the time the research project starts if successful.
- 5.2 In order to fulfil funder reporting requirements, the contract of employment (or other formal arrangement) must extend beyond the end date of the project, or an agreement should be in place by the time the research project starts.

Academic Standing

- 5.2 Co-Is should have suitable experience within the field of research for which an application for funding is submitted.
- 5.3 Co-Is expecting or proposing to assume the role of PI during the lifetime of the award must meet the eligibility criteria defined in either 4.5 or 4.6 above.

6 FACULTY OBLIGATIONS

As determined by the College, the faculties shall ensure that:

- 6.1 Responsibility for reviewing investigator eligibility and appropriateness is clearly assigned within the faculty approval framework, and that those undertaking such a review have a clear understanding of both the College's eligibility policy and the relevant funder policy.
- 6.2 Mechanisms are in place to appropriately manage awards during the grant period and beyond the project end date with due regard to the College's [Post Award Management Policy](#).
- 6.3 Robust structures are in place to support less experienced investigators in the application and management of research (e.g. financial management, eligibility of expenditure, final reporting), including provision of advice and mentoring.
- 6.4 PIs and Co-Is are aware of and accept their responsibilities for the scientific and financial management of the research project, including a clear understanding of the funder terms and conditions of award.

7 INVESTIGATOR OBLIGATIONS

As determined by the faculties, investigators shall ensure that:

- 7.1 Funder terms and conditions of application and award are understood and complied with.
- 7.2 In line with the requirements set out in the [College's Register of External Interests and Annual Declaration Policy](#), and in line with any relevant funder conflict of interest policies and reporting requirements (e.g. [National Institutes of Health Financial Conflict of Interest Policy](#)), investigators are required to declare to the head of department any conflict of interest that could relate to the proposal (such as holding a consultancy with the funder) or that arise during the course of the research project.
- 7.3 Investigators must notify faculty research services of any matters or concerns that could affect the probity of a research proposal or active research project, e.g. potential conflicts of interest; research with potential for misuse; allegations of unethical practice.

Guidance for investigators applying for and managing research funding is available on the Research Office website: [Academics – Key Information](#)