Conflicts of interest policy
CONFLICTS OF INTEREST POLICY

1. General

a) This policy relates to external peer reviewers, the Research Advisory Committee (RAC), the board of trustees and any other funding panels of the charity, their chairs and other members.

b) The purpose of this document is to minimise the potential for conflicts of interest arising and to protect the charity and those who work for it from any perception, real or otherwise, that the external interests and affiliations of its committee members might interfere with their ability to work towards the furtherance of the charity’s objectives.

2. Declaration of interests

a) Any persons covered by this policy, as defined in paragraph 1a), must declare any disclosable external interest on their appointment to the charity, and annually thereafter. A register of interests will be kept up to date by the charity.

b) Interests which should be disclosed by such individuals include:

• Equity interests (if worth £10,000 or more, or more than 1% of the total issued capital) in enterprises with involvement in pharmaceuticals, healthcare, biotech or related areas, or in any other enterprise that may have a real or perceived interest in the work of the charity. Third party investments (e.g. ISAs) should be held exempt from this. Consultancies and other external appointments (paid and unpaid), together with details of any remuneration or other benefits arising from these.

c) Panel members should also adhere to the spirit of this document and declare any other interests which they feel may be a source of conflict, or which might be perceived to conflict, with the interests of the charity. This includes interests held by the panel members spouse or children.

3. Discussion of proposals

a) Details of applications, meeting papers and related correspondence and the names of external referees are strictly confidential and should not be discussed with persons outside the review process.

b) Discussions of a proposal between members of a funding committee which occur outside a committee meeting should be declared to the chair of the committee.

c) If a committee member is approached by an applicant for technical advice on an application, he or she may provide advice, but must report this to the committee chair and secretariat. They may subsequently be asked by the Chair to absent themselves from a discussion of the application concerned.

4. Managing conflicts of interests

a) Where a panel member is an applicant or co-applicant on a grant application, he or she must declare an interest and withdraw from any consideration of that application. That member will not receive documents pertaining to the application, learn the identity of its referees or receive its referees’ reports. He or she must retire from the meeting when the application is assessed. Details of discussion of that application will be deleted from any papers the member receives.

b) Where the chair of the panel is an applicant or co-applicant on a grant application, he or she must declare an interest and should not be involved in that round of meetings. A Vice chair will chair the meeting to prevent any undue influence.

c) Panel members who could be seen as a direct competitor of the applicant (e.g. they are funded or applying for funding on a similar project to the proposal under discussion) or have collaborated or published with the proposal applicant within the past three years, or work in the same institution, should declare an interest and may be asked to withdraw from the meeting for that application, or may be allowed to stay, but not vote on the application.
5. Resolution conflict of interest

a) The Charity recognises that the majority of conflicts or potential conflicts will relate to a particular issue and as such will not present any long term restrictions on an individual’s ability to work for the charity or to sit on its committees.

b) In a small number of cases, major conflicts of interest may arise which compromise an individual’s ability to continue in their position within the charity. Where such a situation relates to a member of a funding committee/panel, the matter will be discussed by the chair of the committee together with a committee staff member or secretary. In cases where agreement cannot be reached through this means, the case will be referred to the committee as a whole, whose decision should be taken as final.

c) Members of funding committees are expected to declare any potential conflicts of interest relating to individual funding decisions to the committee secretariat before the meeting wherein they will be discussed, or during the meeting as soon as the existence of a conflict becomes apparent.

d) In cases where an individual is uncertain as to whether a conflict of interest exists or not, they should report this to the committee secretariat, the secretariat shall discuss the matter with the individual as necessary and report to the Chair, who will decide on a course of action.

e) If an individual is concerned about a possible conflict of interest involving another member of a funding panel, then he or she should raise the matter with the chair of the panel.

5) Updating the policy

a) The charity will endeavour to review this policy, if necessary, every two years, in consultation.