

Conflicts of Interest Policy

August 2021



1. General

a) This policy relates to all members of the Research Review Panel and any other committees or panels, including their Chairs, which are brought together to assess research funding applications submitted to the charity, either for the annual research funding round or for any other schemes within the charity's research funding programme (e.g. studentships, fellowships). It relates to any individual who can have a direct impact on any research funding decisions made by Asthma + Lung UK (A+LUK).

b) The purpose of this conflicts of interest policy is to protect and preserve the integrity of the Research Review Panel and any other committees or panels, including their Chairs, which are brought together to assess research funding applications submitted to the charity. It also aims 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 Panel members might interfere with their ability to work towards the furtherance of the charity's objectives.

c) The existence of such a policy is in accordance with the membership conditions of the Association of Medical Research Charities (AMRC), of which A+LUK is a member, and the stipulations stated within this policy are derived directly from the AMRC's recommendations for such a policy from April 2008 onwards.

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:

- **Other offices held:** any positions, paid or unpaid, held by themselves or their close family, which could be seen to pose a conflict of interest with their role as a member of the A+LUK Research Review Panel e.g. positions of public responsibility / business / academic directorships / consultancies / trusteeships etc., together with details of any remuneration or other benefits arising from these.
- **Financial or equity interests:** details of any material financial interests that they or their close family hold, which could be seen to pose a conflict of interest with their role as a member of the A+LUK Research Review Panel e.g. a shareholding of more than 1%, ownership of intellectual property 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 (such as the tobacco industry). There may be instances when even if such interests may not be regarded as

material, they may nevertheless, for the avoidance of doubt, consider it appropriate to give details. Third party investments (e.g. ISAs) should be held exempt from this.

- **Any other relevant information:** if they consider that they have other interests not covered above, which in the pursuit of good governance and transparency it would be helpful to declare, they should be invited to do so.

c) The individual should adhere, as far as is possible, to the spirit of this document and in so doing should declare any other interests which the individual feels may be a source of conflict, or which might be perceived to conflict, with the interests of the charity.

d) The requirement to disclose these interests also extends to any interests of a similar nature held by an individual's spouse or minor children. In the case of adult children, the individual must declare any interests that they may hold to the extent that he or she is aware of them.

3. Discussion of proposals

a) Details of applications, meeting papers and related correspondence and the names of peer reviewers and lay reviewers 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/panel that take place outside of a Panel meeting or other similar discussion, and which are not pre-arranged as part of the review process, should be declared to the Panel secretariat.

c) If a Panel member or lay reviewer is approached by an applicant for technical advice on an application prior to submission then he or she can choose to provide advice, but must report this to the Panel secretariat and as a result will not take part in any aspect of the review or discussion of the application concerned, nor any other application competing in the same funding stream.

d) If the advice sought by an applicant is on administrative grounds or to seek information on the status of their proposal, the Panel member should refer the applicant to the relevant member of the charity's staff.

4. Resolution of conflicts of interest

a) The Charity recognises that the majority of conflicts arising are unlikely to present any long-term restrictions on an individual's ability to work for the charity or to sit on its committees/panels.

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 Director of Research & Innovation, the Research & Innovation team and Executive Team, with recommendation taken to the Board of Trustees which approves Panel membership. The decision of the Board should be taken as final.

c) Members of funding committees/panels are expected to declare any potential conflicts of interest relating to individual funding decisions to the Panel secretariat as soon as they are recognised. Ideally, potential conflicts of interest that relate to a Panel meeting should be declared before the meeting wherein relevant funding decisions will be discussed. If this is not

possible, and they are declared during the meeting as soon as the existence of a conflict becomes apparent, the most senior member of the Research & Innovation team will make a decision regarding necessary actions, having regard to paragraphs 4 d) and e).

d) Voting RRP members: conflicts of interest that trigger automatic full exclusion

An individual should be automatically excluded from participation in all aspects of a funding decision in cases where that individual has a direct interest in the funding proposal under discussion. A direct interest applies to any of the following situations:

- The individual concerned is an applicant, co-applicant or collaborator on the funding proposal, or has provided technical advice on the funding proposal.
- The individual concerned has a personal or current working relationship (working together on any current research project in a co-investigative, collaborative or advisory capacity) with an applicant, co-applicant or collaborator on the funding proposal.
- A relative¹ of the individual is an applicant, co-applicant or collaborator on the funding proposal.
- An applicant, co-applicant or collaborator on the proposal is a business partner of the individual.

Where an individual is excluded from a funding decision on this basis, he or she should absent themselves from all aspects of the decision-making process related to the relevant funding stream. This includes from scoring any application in the relevant funding stream (at any stage) and from the relevant portion of any meeting while applications in the relevant funding stream are being discussed. Where a conflict has been identified, he or she should not receive the application itself or any related papers, including review forms from peer reviewers and/or lay reviewers.

e) Voting RRP members: conflicts of interest that trigger consideration and selection of an appropriate response

An individual could also be considered to be conflicted under the following circumstances:

- The principal applicant on the proposal is a member or employee of the same institution² as the individual concerned.
- The individual concerned can be seen as a direct competitor of the principal applicant i.e. they are currently being funded or are currently applying for funding on a project of a similar nature to the proposal under discussion.
- The individual has collaborated or published with the proposal's principal applicant within the past three years.
- The individual is aware of any other issue that might reasonably be expected to give rise to, or give rise to the perception of, a conflict of interest.

¹ For the purposes of this document, 'relative' includes, but is not limited to, a spouse (current or past), children, siblings and parents.

² For the purposes of this document, federated institutions (e.g. the University of London) should not be regarded as a single institution.

In any of these cases, the particular situation will be discussed by the Research & Innovation team, and the Chair of the Research Review Panel, who will decide on one of the following options:

1. The individual is allowed to participate in all aspects of the funding decision including participating in the scoring and/or discussion of application(s) with which they are conflicted.
2. The individual cannot participate in the scoring and/or discussion of the application with which they are conflicted but are permitted to participate in the scoring and/or discussion of other applications in the relevant funding stream.
3. The individual absents themselves from all aspects of the funding decision, including the assessment of all applications in the relevant funding stream, and the portion of the meeting during which all applications in the relevant funding stream are being discussed.

In all cases, decision-making will be guided by consideration of the following factors:

- a) Size of the relevant research community in the UK. Discretion will be applied for proposals in disease areas within which there is only a small research community (e.g. where the community is so small that the majority of subject matter experts are conflicted due to co-authoring or collaborating with the principal applicant).
- b) Number of applications in the funding competition. If a low number of proposals are being considered a more robust approach to exclusion will be taken to minimise undue influence over the eventual outcome. If fewer than 3 applications are being considered in a single funding stream option 3 should be enacted.
- c) Nature of competitive relationship, where applicable. All researchers within a certain field could be viewed as being in competition with each other. For the purposes of this policy, action taken will be dependent on the specific detail of any competitive relationship and the establishment of a specific and legitimate basis of competition between the individual concerned and the proposal being considered.

In instances where the principal applicant on the proposal is a member or employee of the same institution² as the individual concerned and this is the sole conflict, it is recommended that option 2 above is usually enacted.

f) Non-voting RRP Chair

In accordance with RRP Terms of Reference, the RRP Chair is not permitted to apply for A+LUK funds during their tenure and does not score any proposal submitted for consideration. The Chair will absent themselves from all other aspects of the evaluation of a relevant proposal and, where applicable, the portion of any meeting during which the relevant proposal is being discussed if one of the following conflicts of interest exist:

- The individual concerned has a personal or current working relationship (working together on any current research project in a co-investigative, collaborative or advisory capacity) with an applicant, co-applicant or collaborator on the funding proposal.
- A relative¹ of the individual is an applicant, co-applicant or collaborator on the funding proposal.

- An applicant, co-applicant or collaborator on the proposal is a business partner of the individual.
- The principal applicant on the proposal is a member or employee of the same institution² as the individual concerned.

Under the above circumstances, if fewer than 3 applications are being considered in a single funding stream the Chair should absent themselves from all aspects of the funding decision, including the discussion of all applications in the relevant funding stream, and the portion of the meeting during which all applications in the relevant funding stream are being discussed.

The Chair could also be considered to be conflicted under the following circumstances:

- The individual concerned can be seen as a direct competitor of the principal applicant i.e. they are currently being funded or are currently applying for funding on a project of a similar nature to the proposal under discussion.
- The individual has collaborated or published with the proposal's principal applicant within the past three years.
- The individual is aware of any other issue that might reasonably be expected to give rise to, or give rise to the perception of, a conflict of interest.

In any of these cases, the particular situation will be discussed by the Research & Innovation team, with a final decision made by the Director of Research & Innovation where necessary, who will decide on one of the following options:

1. The Chair is allowed to participate in all aspects of the funding decision as per RRP Terms of Reference, including participating in discussion of application(s) with which they are conflicted.
2. The Chair will absent themselves from all aspects of the evaluation of a relevant application and, where applicable, the portion of any meeting during which the relevant application is being discussed.
3. The Chair will absent themselves from all aspects of the funding decision, including the discussion of all applications in the relevant funding stream, and the portion of the meeting during which all applications in the relevant funding stream are being discussed.

In all cases, decision-making will be guided by consideration of the following factors:

- a) Size of the relevant research community in the UK. Discretion will be applied for proposals in disease areas within which there is only a small research community (e.g. where the community is so small that the majority of subject matter experts are conflicted due to co-authoring or collaborating with the principal applicant).
- b) Number of applications in the funding competition. If a low number of proposals are being considered a more robust approach to exclusion will be taken to minimise undue influence over the eventual outcome. If fewer than 3 applications are being considered in a single funding stream option 3 should be enacted.

- c) Nature of competitive relationship, where applicable. All researchers within a certain field could be viewed as being in competition with each other. For the purposes of this policy, action taken will be dependent on the specific detail of any competitive relationship and the establishment of a specific and legitimate basis of competition between the individual concerned and the proposal being considered.

During relevant portions of any meeting from which the Chair is excluded, another member of the RRP who is not conflicted will be selected by the panel secretariat in advance of the relevant meeting to chair the discussion for the relevant proposal.

g) In cases where an individual is uncertain as to whether a conflict of interest exists or not, they should report this to the Panel secretariat. The secretariat shall discuss the matter with the individual as necessary and report to the Director of Research & Innovation, who will make a decision with regard to the provisions of paragraphs 4 d) e) and f). In cases where an individual is uncertain as to whether a conflict of interest exists or not *during a meeting*, the most senior member of the Research & Innovation team present will make a decision with regard to the provisions of paragraphs 4 d),e) and f).

h) 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 Panel secretariat.

i) Where an individual is conflicted on multiple grounds, the action that confers highest level of exclusion from participation in evaluation will take precedence.

5. Updating the policy

a) The charity will review this policy every two years. Approval is sought from the charity's Nominations and Remuneration Committee.
