

## SBRI Healthcare Programme Conflict of Interest Policy

### Introduction

It is essential that the personal and institutional interests of those involved in reviewing applications do not influence the decision making process. All those involved share responsibility for ensuring this. Accordingly, it is important that Panel members or observers (hereafter Panel member), peer reviewers, public reviewers and public members of Panels are aware of what constitutes a potential or actual conflict of interest (COI). The purpose of this document is to set out the Policy for identifying and handling Conflicts of Interests (COI) at any review Panel meeting irrespective of it being held face to face or remotely (ie teleconference, videoconference).

### Underlying principles

- The underlying principles of this policy are those of the [Nolan committee on standards in public life](#).
- Consistency across SBRI Healthcare and with similar research funding organisations is desirable but programmes must be able to flexibly interpret the policy and its definitions.
- A potential conflict which is not declared and managed may result in undue influence or bias, embarrass or put the credibility of the programme and its members at risk.
- It is also important that there are sufficient review Panel members who have the appropriate knowledge and skills to make an informed decision. Each decision to exclude someone from a review Panel must balance these competing risks of bias due to conflict of interest versus wrong decisions from lack of expertise.

### Definition of conflicts of interests

The integrity of a Panel member and peer reviewer is of paramount importance. This means that any personal interests must never influence, or be seen to influence, the outcome. All potential conflicts should be declared and no de minimis level for financial conflicts should be used or assumed. This list is not exhaustive, so if a conflict of interest is considered it must be declared at the outset.

We consider that a conflict of interest exists where the Panel member or peer reviewer's:

- Partner or close family member or friend are an applicant on the proposal being assessed
- Partner or close family member are an applicant on a competing research proposal
- Are directly involved in the work the applicant proposes to carry out
- Work in the same research organisation as the applicant(s), co-applicant(s) or project partners
- Work closely with the applicant(s) (e.g. as a co-author or PhD supervisor) or have done within the last five years
- May benefit financially from the work (for example if involved with a company acting as a project partner)
- Partner or close family member, have a financial or commercial interest (in receipt of pensions, consultancies, directorships, honoraria, significant shareholdings, financial interests or voting rights in companies)
- Are a close colleague of the applicant such as in the same department or a more distant colleague of an applicant for instance from the same University or organisation
- Have previously been or are an important research collaborator with the applicant

## **Detecting/declaring potential conflicts of interests**

- In the first instance SBRI Healthcare staff will assess for COIs during review allocation and shortlisting meeting/interview scheduling.
- Review Panel members or peer reviewers will declare any additional COIs to SBRI Healthcare staff following review allocation and at shortlisting meetings/interviews.
- The relevant Panel Chair should offer advice and adjudicate on the nature of the potential conflict and rule on if it requires acting on with the support of SBRI Healthcare staff.
- It is the responsibility of each review Panel member to declare interests to SBRI Healthcare staff and the Chair as they emerge or as members become aware of them.
- Panel members will be asked to complete a declaration of interests form when they join a Panel and at least annually thereafter. It is their responsibility to ensure that any relevant updates are provided as and when they occur.

## **Handling COIs at shortlisting review or external peer review**

- Conflicted review Panel reviewers or peer reviewers will not be assigned the application in question.
- If a new COI is declared once a review assignment has been made the application will be transferred to another review Panel member or peer reviewer. External peer reviewers to be thanked for their involvement.

## Handling COIs at shortlisting meetings/interviews

- All COIs will have been indicated on the meeting schedule by SBRI Healthcare staff.
- Review Panel members will declare any undisclosed COIs as soon as encountered.
- Conflicted review Panel members will leave the room during discussion of the application in question and be invited back by a member of staff once the discussion is complete.
- If the Chair has a potential conflict of interest the deputy Chair should chair the item and rule if the Chair may remain and contribute to the discussion.
- In the event of both Chair and Deputy Chair having a potential conflict of interest requiring both to leave the room, the particular agenda item will be chaired by another member of the review Panel as identified by the Programme Director/Panel Chair or senior member of the secretariat.

## Other meetings/forums

These include, for example, monitoring reports, site visits, email exchanges. Conflicted members should follow the spirit of the above policy with the same context in regards to whether they should be party or contribute to discussions, or be involved.

## Dealing with concerns regarding potential conflicts of interest

Any concerns regarding potential conflicts of interest should be sent to [sbri@lgcgroup.com](mailto:sbri@lgcgroup.com) These will then be directed to the respective centre, who have a confidential process for dealing with potential conflicts of interest and will oversee the independent review of allegations received. Further information on [whistleblowing](#) is available.

## Overall Responsibility

- Directors, Assistant Directors, Panel Chairs and their teams must ensure the policy is complied with.
- Chairs should regularly communicate the policy and adjudicate on specific instances of potential conflicts with their review Panel or board members.
- SBRI Healthcare staff attendees will ensure the policy is adhered to at each meeting.
- All Panel members must have sight of this policy and agree to abide by it and all other supporting guidance relevant to their role before undertaking any review of applications. This agreement must be made in writing and be recorded by SBRI Healthcare staff. Guidance to Panel members should include reference to the Fraud Act 2006 and the potential consequences in relation to this of failing to comply with this policy.