

**North West Cancer Research Conflict of Interest and Research Advisory Groups Policy**

 **Definition.**

* A conflict of interest is defined as any financial, personal, professional or institutional interest or connection of any member of our Research Advisory Groups which may, if undeclared, expose the advisory group and their recommendations open to accusations of bias or inappropriate influence in the peer review or assessment, funding recommendations or scientific advice given to North West Cancer Research (NWCR).
* The notion of ‘conflicts of interests’ does not imply an immoral action. Conflicts may arise out of the facts and not from fraudulent motivations. They do not in themselves inevitably cause harm; it is ambiguity and the possibility for harm that arouse concern.
* Advisory group members are not required to declare all associations they may have outside grant giving functions of NWCR, only those which relate to or which could impact on the activities of the group where they are members. Individuals should register all relevant interests and should declare any relevant interest when dealing with or discussing a matter to which it is pertinent.
* Relevant interests may include both financial and non-financial interests. The test of relevance is whether the interest might reasonably be thought to affect the way in which an individual discharges his or her duties. The test is not whether an individual’s actions will be influenced by the interest but whether the public might reasonably think that this may be the case.
* It is up to each individual advisory group member to decide whether a conflict of interest could exist and, if so, to declare the conflict. When deciding on such matters, consideration must be given to how things could appear to others and, in all cases, individuals should err on the side of caution, declaring an interest if there is any possibility that a conflict of interest may exist.
* All advisory group members must submit a Declaration of Conflicts of Interest each year to NWCR. Declarations will be sought by and submitted to the Chairman for each individual group.

**Identification and resolution of conflicts of interest.**

* Potential conflicts of interest highlighted by declarations of interest, including consultancies and appointments, can be resolved by:
	+ the individual(s) concerned being excluded from the relevant (or entire) decision making discussion;
	+ restricting access to information to the individual(s) concerned.

**Examples of conflicts.**

* **Financial conflict**: anyone who has a direct or indirect financial interest with a grant application submitted to NWCR.
* **Applicant and co-applicant(s) conflict**: anyone listed as the main applicant or co-applicant on a grant application submitted to NWCR.
* **Collaborator(s) conflict:** anyone listed as a collaborator or having collaborated within the last five years with a main applicant and/or co-applicant(s) on a grant submitted to NWCR or other funding organisations.
* **Same institution conflict:** anyone working in the same department in the institution which hosts the main applicant or co-applicant(s) on a grant application submitted to NWCR at the time of his or her commitment to the advisory group.
* **Competition conflict:** anyone who has competitive interest with a grant application being reviewed in the NWCR peer review process which could be perceived as resulting in a strong decision bias during the time of his/her commitment to the advisory group.
* **Other conflicts of interest:** The above list is not exhaustive and other conflicts will inevitably arise with individual agenda items. An example would be where an application is received that turns out to be similar to one in preparation, or submitted to another funder, by a member of the advisory group. In such cases the conflict of interest must be declared to the NWCR Research Manager as soon as it becomes evident.

**Automatic exclusion from participation in funding decisions.**

* Individuals must absent themselves from the relevant part of any meeting where the matters concerning a grant proposal with which they are connected are discussed. They may not take part in any decisions taken in relation to such a grant proposal, and may not receive any papers relating to it.
* An individual is deemed to have such a connection when they are:
	+ The sole applicant;
	+ A joint applicant;
	+ A relative or family member of one of the grant applicants;
	+ A business partner of one of the grant applicants;
	+ A member or employee of the same department within a university or institutional department as one of the grant applicants.
* Where the Chair of the advisory group is a named principal or co-applicant in an application he/she is absent him/herself for the entire meeting and call round. In this circumstance the Deputy Chair will Chair the meeting and research round.

**Exclusions at the North West Cancer Research discretion.**

* Individuals may be excluded from advisory group discussions at the discretion of NWCR when:
	+ They are a direct competitor of the applicant;
	+ They have acted as an external referee or served on another committee where the proposal was considered by another funding body.
* If an individual becomes aware of any other matter that would reasonably be expected to give rise to or be viewed as a conflict of interest (whether academic, scientific, financial or personal) then they should declare the matter to the NWCR Research Manager before the meeting or as soon as a potential conflict becomes apparent at the meeting.
* The NWCR Research Manager, or where in doubt with consultation with the Chair of the advisory group, will determine whether the individual should:
	+ Take a full part in the meeting;
	+ Be permitted to comment on the application and take part in the discussions but not present the application to the advisory group;
	+ Be permitted to comment on the application and participate in discussions but not take part in the decision;
	+ Absent him/herself from the relevant part of the meeting;
	+ Absent him/herself form the entire meeting/call round,
* The NWCR Research Manager should bring to the Chair’s attention all relevant information concerning any form of connection between an application and a member of the advisory groups.

**Cases of uncertainty.**

* If an individual is in any doubt as to the relevance of an interest that he or she has, such an interest should be disclosed to the NWCR Research Manager before the meeting or, if not practicable, as soon as the potential conflict becomes apparent at the meeting. The NWCR Research Manager will consult as necessary and the Chair, or the Deputy Chair where the Chair has conflicts, and shall make a decision by reference to the bullets above.

**Matters other than those concerning funding decisions.**

* Routinely, individuals must absent themselves from the relevant part of any meeting where matters concerning their interests are discussed and may not take part in any decisions undertaken relevant to such interests.

**Discussions of applications outside meetings.**

* Where advisory group members feel it necessary to discuss an application prior to the meeting this should be declared to the Chair.
* If an advisory group member is approached by an applicant for advice on an application the member may provide such advice but must disclose this fact to the NWCR Research Manager. The individual may be excluded from all or part of the meeting at which the application is considered.

**Raising concerns about conflicts of interest of others.**

* An individual who is concerned about another individual’s potential or actual conflicts of interest should raise the matter as set out below:
	+ Issue concerning an advisory group member should be raised with the Chair or NWCR Research Manager;
	+ Issues about North West Cancer research staff should be raised with the Chair;
	+ Issues about the Chair should be raised with the Board