

Conflicts of interest policy

October 2017

This document outlines Asthma UK's conflicts of interest policy for both scientific and lay members of the Research Review Panel (including the Chair), as well as lay reviewers who are not members of the Research Review Panel (referred to in the document as the lay reviewer panel), when taking part in any review processes linked to the charity's research funding programme

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 UK, namely the Research Review Panel and lay reviewer panel¹. The purpose of this conflict of interest policy is to protect and preserve the integrity of the Research Review Panel and lay reviewer panel, as both of these groups have the opportunity to discuss research funding applications and their reviews are not done in isolation.

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 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, of which Asthma UK 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 Asthma UK Research Review Panel or lay reviewer 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 Asthma UK Research Review Panel or lay reviewer 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,

¹ For the purposes of this document, the term 'committee' or 'panel' should be taken to mean only those committees/panels which are involved in making decisions relating to Asthma UK's research funding programme, namely the Research Review Panel and lay reviewer panel, where this applies.

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 Chair of the Panel and/or the Research team.

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 may provide advice, but must report this to the Panel Chair and Research team. They may subsequently be asked by the Chair to absent themselves from a review or discussion of the application concerned.

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 Chair of the Research Review Panel together with members of the Research team. In cases where agreement cannot be reached through this means, the case will be referred to the Executive Director of Research and Policy who will make a recommendation to the Council of Trustees regarding the action that should be taken, and the decision of Council 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 before the meeting wherein they will be discussed, or during the meeting as soon as the existence of a conflict becomes apparent. The chair will then make a decision, having regard to paragraphs 4 d) and e).

d) **Automatic exclusion from participation in a funding decision**

An individual should be automatically excluded from participation in 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
- The individual concerned has a personal or working relationship with an applicant, co-applicant or collaborator on the funding proposal
- A relative² 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
- An applicant, co-applicant or collaborator on the proposal is a member or employee of the same institution³ as the individual concerned.

Where an individual is excluded from a funding decision on this basis, he or she should absent themselves from the meeting while the proposal concerned is being discussed. He or she should not receive the application itself or any related papers, including the review forms from the peer reviewers and lay reviewers.

If there are cases where the Chair of the Panel has a direct interest in the funding proposal under discussion, they should absent themselves from the meeting and the Research Operations Manager will chair the discussion for that proposal. If, for any reason, the Research Operations Manager has discussed the funding proposal with an applicant prior to submission, or has another possibly compromising relationship with an applicant, another member of the Panel (likely the lead reviewer for the specific funding proposal) will chair the discussion for that proposal.

e) **Exclusion at the charity's discretion**

In certain situations, an individual may be excluded from discussion of a proposal at the discretion of the charity. Examples of such situations include:

- The individual concerned can be seen as a direct competitor of the 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, or are currently carrying out research in a similar area
- If the individual concerned has declared that they have acted as an external reviewer, or on a funding panel/committee, in respect of the proposal under discussion at a time when the proposal was being discussed by another funding body
- The individual has collaborated or published with the proposal 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 Panel Chair, Research team and/or the Executive Director of Research and Policy, who will decide on one of the following options:

- The individual is allowed to participate fully in the funding decision
- The individual is allowed to discuss and vote on the proposal but may not present the proposal to the Panel
- The individual may comment on the proposal but not take part in any funding decisions
- The individual absents himself from the meeting while the proposal is being discussed.

² For the purposes of this document, 'relative' includes, but is not limited to, a spouse (current or past), children, siblings and parents.

³ For the purposes of this document, federated institutions (e.g. the University of Wales or the University of London) should not be regarded as a single institution.

If an agreement cannot be reached between the Panel Chair, Research team and/or Executive Director of Research and Policy, the individual must absent himself from proceedings while the proposal is being discussed.

f) 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 Chair, who will make a decision with regard to the provisions of paragraphs 4 d) and e).

g) 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 with the Council of Trustees.
