

## **Scientific Advisory Panel**

### **Conflicts of Interest Policy**

As part of our commitment to impartiality and to the integrity of the peer review process, Pharmacy Research UK (the Charity) has established a Conflicts of Interest Policy.

a) This policy relates to the Scientific Advisory Panel (SAP) – its Chair and members - and to any other funding panels and committees of the Charity.

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.

c) This policy is based on the standard conflicts of interest policy of the Association of Medical Research Charities (AMRC).

### **2) Declaration of interests**

a) Any persons covered by this policy (the SAP and any other funding panels and committees of the Charity) 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) 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 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 then 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.
- d) If the advice sought by an applicant is on administrative grounds or to seek information on the status of their proposal, the committee member should refer the applicant to the relevant member of the charity's staff.
- e) Members of the SAP are eligible to apply for funding but are not permitted to take part in any discussions relating to their application. The Chair of the Panel is not allowed to be named as Principal Investigator on research applications.

#### **4) Resolution of Conflicts of Interest**

- a) The Charity recognises that the majority of conflicts arising 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 the SAP/ other committees, 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 Panel 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.

#### **5) 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 the sole applicant on the funding proposal
- The individual is a joint applicant on the proposal

- A relative<sup>1</sup> of the individual is the sole or a joint applicant
- An applicant on the proposal is a business partner of the individual
- An applicant on the proposal is a member or employee of the same institution<sup>2</sup> 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 referee reports.

## **6) 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
- The individual has acted as an external referee, 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 committee Chair and secretariat, 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 committee
- 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

If an agreement cannot be reached between the committee Chair and secretariat, the individual must absent himself from proceedings while the proposal is being discussed.

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

---

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

<sup>2</sup> 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.

with the individual as necessary and report to the Chair, who will make a decision with regard to the provisions of paragraphs 3d) and 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.

## **7) Updating the Policy**

Pharmacy Research UK will endeavour to review this policy, if necessary, every two years, in consultation with the board of Trustees.

June 2013