



## **Conflict of Interest Policy**

### **Diabetes Research and Wellness Foundation**

#### **Section (1): Scope**

This Conflict of Interest Policy is for:

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- The Chairperson of the Research Advisory Board
  - The members of the Research Advisory Board
  - External Peer Reviewers
  - Grant applicants
  - Fellowship applicants and
  - Diabetes Research and Wellness Foundation (hereafter referred to as DRWF) staff involved in all aspects of the research grant funding, application submission and peer review processes
  - Any other individuals who are brought together to assess research funding applications submitted to the charity, in respect of its research funding.
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#### **Section (2): Definition**

A conflict of interest arises when the best interests of an individual are, or could be, different from the best interests of the charity and its beneficiaries.

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 those listed in Section (1) might interfere with their ability to work towards the furtherance of the charity's objectives.

Compliance is required by any individual who could have a direct impact on any research funding decisions made by DRWF. The people listed in Section (1) should adhere to the spirit of this document and declare any other interests which they feel may be a source of conflict, or which might be perceived to conflict, with the interests of the charity.

#### **Section (3): Association of Medical Research Charities**

This policy is in accordance with the membership conditions of the Association of Medical Research Charities of which DRWF is a member.

#### **Section (4): Statement of Intent**

DRWF is committed to ensuring its decisions and decision-making processes are, and are seen to be, free from personal bias and do not unfairly favour any individual connected with the charity.

It is the policy of DRWF to:

- Ensure that all people listed in Section (1) understand what constitutes a conflict of interest and that they have a responsibility to recognise and to declare any conflicts that might arise for them
- Document the conflict and the action(s) taken to ensure that the conflict does not affect the decision making of the organisation

### ***Section (5): General Procedures***

***If the individual concerned is an applicant, co-applicant or collaborator on the funding proposal, he/she will be excluded from attending the meeting***

When a person listed in Section (1) identifies that they have a potential conflict of interest other than being an applicant, co-applicant or collaborator on the funding proposal, they must:

- Declare it as soon as he/she becomes aware of it
- Ensure that it is minuted in the appropriate Research Advisory Board papers
- Not take part in any Research Advisory Board discussions relating to the matter
- Not take part in any decision making related to the matter
- Not be counted in the quorum for decision-making related to the matter

*In the interests of frank and open discussion, a person affected by a conflict of interest must leave the room while related discussion/decision-making is taking place, unless there is good reason for them to stay.*

The minutes should reflect:

- The declared conflict
- That the individual or individuals left the room, or the reason that they were asked to stay
- That the individual or individuals took no part in the discussion or decision-making process on the matter
- That the meeting was quorate (not counting the affected individual or individuals)
- Any other actions taken to manage the conflict

NB: If a person listed in Section (1) is unsure what to declare, they should err on the side of caution and discuss the matter with the Chairperson of the Research Advisory Board for confidential guidance.

### ***Section (6): Specific Procedures***

#### ***(6i): 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 the Research Advisory Board 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, he or she may provide advice, but must report this to the committee Chair and/or the DRWF Research Manager. 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 Research Advisory Board member should refer the applicant to the relevant member of the charity's staff.

#### **(6ii): 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 has a personal or working relationship with an applicant, co-applicant or collaborator on the funding proposal
- A relative 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 department at a given institution as the individual concerned.

Where an individual is excluded from a funding decision on any of these bases, 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 external peer reviewers.

If there are cases where the Chairperson of the Research Advisory Board has a direct interest in the funding proposal under discussion, they should absent themselves from the meeting and the elected Deputy Chair will lead the discussions for that proposal.

If, for any reason, the Deputy Chair has discussed the funding proposal with an applicant prior to submission, or has another possibly compromising relationship with an applicant, another member of the Research Advisory Board e.g. the lead reviewer for the specific funding proposal will chair the discussion for that specific proposal.

#### **Section 7: Resolution of Ongoing Conflicts of Interest**

DRWF recognises that the majority of conflicts or potential conflicts 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.

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 membership of the Research Advisory Board, the matter will be discussed by the Chairperson of the Board together with a second Research Advisory Board member or with the Chief Executive of DRWF. In cases where agreement cannot be reached through these means, the case will be referred to the committee as a whole, whose decision should be taken as final.

If an agreement still cannot be reached after discussion among the Chairperson of the Board, the other Research Advisory Board members and/or the Chief Executive, the individual must absent himself from proceedings while the proposal is being discussed.

### ***Section 8: Exclusion at the Charity's Discretion***

There may be some circumstances where an individual may be excluded from discussion of a proposal at the discretion of the charity.

Examples of such situations may 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 sat 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 these cases, the particular situation will be discussed by the Chairperson of the Board, the other Research Advisory Board members and/or the Chief Executive 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 RAB
- 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.

### ***Section (9): Review and Update of the Conflict of Interest Policy***

The charity will endeavour to review this policy where necessary every two years, in consultation with its Board of Trustees.

Policy adopted on [October 2018]  
Next due for review on [October 2021]