**Pancreatic Cancer UK**

**Conflict of Interests Policy**

**Scope of the Policy**

This policy guides the code of conduct for everyone involved in the research grant-giving programme at the charity, including:

* Scientific and medical advisers, including Scientific Advisory Board (SAB) members
* External referees
* Applicants
* Staff
* Trustees

The purpose of this policy 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 the members of the SAB might interfere with their ability to work towards the furtherance of the charity’s objectives.

The existence of this policy is in accordance with the membership conditions of the Association of Medical Research Charities (AMRC), of which Pancreatic Cancer UK is a member.

**Confidentiality**

All research applications and related correspondence, SAB meeting papers, and the identity of external referees are strictly confidential. They must be kept secure and not disseminated to or discussed with others outside the review process.

Discussions of a proposal between members of the SAB that take place outside of the Board 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.

SAB members and external referees can expect that their comments will be treated in confidence by staff and trustees. Applicants can expect that staff and trustees will not disclose details of their applications to those outside the review process.

SAB members, staff and trustees should refuse any requests for information or feedback from applicants on how a particular judgement was reached.

Applicants should not, under any circumstances, directly approach members of the SAB in connection with their (or another’s) research application. If a member of the SAB 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 SAB Chair and Head of Research. They may subsequently be asked by the Chair to absent themselves from a review or discussion of the application concerned.

When applicants are informed of the outcome of their applications, Pancreatic Cancer UK will provide anonymised versions of external referees’ comments, and may also summarise the conclusion reached by the SAB. Information which might identify the comments of individual SAB members or external referees will not be revealed.

It is our policy to let external referees know the final outcome of applications they have reviewed after we have communicated decisions to applicants. We ask that referees regard all details of applications and their outcomes as confidential.

**Declaration of interests**

All people involved in the grant giving process must declare any disclosable external interests to the charity through its Register of Interests form, including other offices held, financial or equity interests, and any other relevant information.

**Conflict of Interests**

SAB members will be asked to declare any potential conflicts of interest before the SAB 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 on action, having regard to the paragraphs (a) and (b) below.

1. *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 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 institution 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 external referees.

If there are cases where the SAB Chair has a direct interest in the funding proposal under discussion, they should absent themselves from the meeting and another member of the SAB (likely the lead reviewer for the specific funding proposal) will chair the discussion for that proposal.

1. *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 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 between the SAB and a decision will be made on the course of action from 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.

If an agreement cannot be reached between the SAB, the individual must absent themselves from proceedings while the proposal is being discussed.

As part of the external peer review process all referees will be required to declare any conflicts of interest with the application(s) they are assessing.

**SAB Membership and Grant Applications**

To avoid conflict of interests the Chair of the SAB will not be able to make any applications for funding as a principal or co-investigator.

Other members of the SAB may make applications to the charity but they will not take part in the assessment of them and will leave the meeting during discussion of their application or those from within their academic department.

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