

Health and Care Research Wales Project Grants

Confidentiality and Disclosure: A Guide for Applicants, Reviewers and Panel/Board Members

1 Confidentiality of applications

Applications submitted on this portal are considered confidential; that is, they contain information that is considered critical to an organisation's ongoing operations and could seriously impede them if made public or shared internally. They may also contain material considered personal by the General Data Protection Regulation (GDPR) EU 2016/679 and will therefore be handled in accordance with this Regulation at all times. Our statements regarding privacy and data protection are available on the homepage.

Information contained within applications must necessarily be divulged to third parties in order to make funding decisions. Information from applications may also be used internally to support process improvement and for analysis, research and evaluation. Disclosure of information within applications is tightly controlled as follows:

The Health and Care Research Wales Project Grants Team (PGT) makes best endeavours to ensure that the contents of applications are treated as confidential. Application forms and any associated papers are sent to and received by peer and public reviewers (hereafter reviewers) and Panel/Board members, including public members and observers (hereafter Panel/Board members) in confidence. Electronic information may be transferred through the secure Research Management System, a secure transfer system, or on encrypted, password-protected removable storage devices by secure carrier. On limited occasions where none of the preceding methods can be used, electronic information is transferred by email. Paper information is sent by secure carrier.

The PGT staff do not disclose or discuss the content of any application submitted with any individuals outside the PGT, our customers and partner organisations, except peer and public reviewers, Panel/Board members and observers. An exception exists in relation to overlap checks, as details on the level of overlap require review of the abstract, and if necessary, some other details from the application, in order to make a judgement.

By acting as a reviewer or Panel/Board member, individuals are agreeing to treat as confidential all applications sent to them by the PGT. They must not disclose the fact that the applicant has applied for a research award nor the content of the application to any other person (including work colleagues) without the prior written consent of the applicant, obtained via the PGT. Equally, they must not use the information in the application for any purpose other than providing a review of it to the PGT or the Panel/Board. In addition, any

personal information contained within the application must be treated according to the GDPR and therefore must not be disclosed to any third party unless consent has been given for a specific purpose as part of the application process. For further information, the Information Commissioner's office (ICO) has produced the following comprehensive code of conduct for data sharing: [ICO code of conduct for data sharing](#).

Applications will not be reviewed by individuals where there is a known conflict of interest. Detailed guidance on what constitutes a conflict of interest and how it is handled can be found in the appendix.

Summary meeting minutes may be published after consideration of applications at Panel/Board meetings and communication of decisions to applicants. The summary minutes contain the following details relating to application forms: application number (all applications); title (full applications).

2 Data security

The PGT stores all electronic information in secure premises and any confidential electronic information removed from secure premises by the PGT staff is encrypted and password protected. Reviewers and Panel/Board members are expected to maintain this level of electronic data security. Cloud-based services such as Dropbox cannot be assumed secure and should not be used for storage of application forms and meeting papers unless there is a contractual guarantee of security from the provider.

All individuals who are sent copies of applications and any associated documents, whether electronic or paper copies, must ensure that these are not retained indefinitely. In general, paper copies collated as Panel/Board papers should be left behind for shredding at the end of the meeting. Electronic records may be retained until contract negotiations for successful applications are completed, after which point they must be deleted.

3 Confidentiality of peer and public reviews

Peer and public reviews (hereafter reviews) are considered confidential. Anonymised reviews and scores are shared with Panel/Board members (if no conflict of interest). The anonymised reviews are also disclosed to the authors of the application. Any sections of review forms which are not disclosed to the authors of the application are indicated to the reviewer. After submission, anonymised reviews and scores are made available to other reviewers of the same application. Reviewer comments and scores may also be used within Health and Care Research Wales / Welsh Government for analysis, research and evaluation purposes.

Receipt of the review form from the PGT, and subsequent completed return, form a 'mutual confidentiality agreement' covering the response. This information will not be released without prior approval unless it is seen to be overwhelmingly in the public interest, i.e. when the benefits of disclosure outweigh the duty of confidentiality.

4 Confidentiality of reviewer identity

Reviewer identity is not disclosed to applicants and anonymous reviews are returned to applicants. It may be disclosed to Panel/Board members, except where there is a conflict of interest with the reviewer and/or the applicant. It is planned to publish lists of those undertaking review for the PGT annually. Reviewer identity data may also be used within Health and Care Research Wales / Welsh Government for analysis, research and evaluation purposes.

5 Confidentiality of Panel/Board discussions

Panel/Board discussions form the basis of the feedback/outcome letters to applicants, and feedback points are noted in the full minutes, except in the case of personal awards. Comments are not attributed to individual Panel/Board members. The full minutes are considered confidential and, in most cases, these are circulated to Panel/Board members, the PGT and our customers that are involved in the commissioning process. Where there is a conflict of interest, the minutes of discussions of applications are omitted from the copy circulated to the conflicted Panel/Board member. They may also be used within Health and Care Research Wales / Welsh Government for analysis, research and evaluation purposes.

Panel/Board members must not disclose details of discussions or decisions to anyone outside the Panel/Board, our customers or the PGT. Individuals assigned to lead discussion (Designated Panel/Board Members) are not disclosed to applicants (except in meetings where the applicants are present as part of the assessment process).

Summary meeting minutes are published after consideration of applications at Panel/Board meetings and communication of decisions to applicants. The summary minutes contain the application reference number and title, and the following details relating to Panel/Board discussions: names of Panel/Board members with conflict of interest; outcome of Panel/Board discussion for each including whether or not the application is recommended for funding.

6 Confidentiality of written comments

Written comments on applications may be submitted by Panel/Board members to contribute to Panel/Board discussion, either if they will be absent from the Panel/Board meeting, or if they play a particular role in the discussion (Designated Panel/Board Member). These records are used to aid the PGT Secretariat in writing up the meeting minutes and, in some instances, contract negotiation. They are not disclosed to applicants. Written comments may also be used within Health and Care Research Wales / Welsh Government for analysis, research and evaluation purposes.

7 Confidentiality of Panel/Board member identity

Panel/Board member identity is not considered confidential. Names and affiliations of Panel/Board members may be published on our websites and in other relevant documents.

Summary meeting minutes are published after consideration of applications at Panel/Board meetings and communication of decisions to applicants. The summary minutes contain the following detail relating to Panel/Board members and observers: names of people attending Panel/Board meetings (Panel/Board members, secretariat and observers); names of Panel/Board members with apologies for non-attendance.

8 Freedom of Information Act

Requests for information will be considered on a case-by-case basis in accordance with the Welsh Government's Privacy Policy and with our obligations under the Freedom of Information Act.

Type of information	Disclose to reviewers	Disclose to Panel/Board members	Disclose to applicants	Published on website and in other programme documents	Disclose to the public if requested under FOI
Application number and title	Yes	Yes	Yes	Yes	Publicly available on website as part of summary meeting minutes
Complete or part applications	Yes	Yes, if no conflict of interest	Only applicant's own application	Only applicant approved abstracts from successful applications. Includes Chief Investigator name and affiliation.	No
Peer and public review comments	Anonymous comments relating to applications reviewed	Yes, if no conflict of interest	Anonymous comments relating to applicant's own application	No	No
Peer reviewer name	As part of annual list (planned); not at time of review, and not in association with details of application reviewed	Yes, if no conflict of interest	As part of annual list (planned); not at time of review, and not in association with details of application reviewed	Annual list of names publicly available on website (planned)	Annual list of names publicly available on website (planned)

Type of information	Disclose to reviewers	Disclose to Panel/Board members	Disclose to applicants	Published on website and in other programme documents	Disclose to the public if requested under FOI
Public reviewer name	As part of annual list (planned); not at time of review, and not in association with details of application reviewed	No	As part of annual list (planned); not at time of review, and not in association with details of application reviewed	Annual list of names publicly available on website (planned)	Annual list of names publicly available on website (planned)
Peer and public review score	Yes, those scores relating to applications reviewed	Yes, if no conflict of interest	Yes (if requested)	No	No
List of Panel/Board members (excluding Panel/Board observers)	Yes	Yes	Yes	Yes	Publicly available on website
Attendance at meeting, as recorded in minutes (including Panel/Board observers) and conflicts of interest	Yes	Yes	Yes	Yes	Yes
Names of Designated Panel/Board Member	No	Yes	No	No	No
Written comments (from Panel/Board members)	No	Yes, if no conflict of interest	No	No	No
Full meeting minutes	No	Yes, if no conflict of interest	Only those parts relating to applicant's own application	No	No

Type of information	Disclose to reviewers	Disclose to Panel/Board members	Disclose to applicants	Published on website and in other programme documents	Disclose to the public if requested under FOI
Summary meeting minutes	Yes	Yes	Yes	Yes	Publicly available on website
Equality and diversity monitoring information (where collected)	No	No	No (data is anonymised, so applicant's own data is not available)	No	No

Appendix: Conflict of Interest

It is essential that the personal and institutional interests of those involved in reviewing applications do not influence the decision-making process. All those involved share responsibility for ensuring this. Accordingly, it is important that Panel/Board members or observers (hereafter Panel/Board member), peer reviewers, public reviewers and public members of Panels/Boards are aware of what constitutes a potential or actual conflict of interest (COI). This is set out in the following document.

PANEL/BOARD MEMBERS

General

The responsibility for disclosing any COI rests with the Panel/Board member concerned and should be declared as soon as the conflict is realised. GMG staff will also identify potential COI. Instances of COI are identified below. In addition, in some specialist/niche areas of research it is likely that avoiding any conflict is impossible. In these cases, the secretariat will seek to keep these to a minimum. If a Panel/Board member remains in any doubt about a potential COI they should take advice from the chair and the Panel/Board at the time. Panel/Board members must decline to act as Designated Panel/Board Member where there is a COI. Panel/Board members have a responsibility to return, or to confirm destroyed, any documents they receive related to an application for which they are confirmed as conflicted.

Procedure at meetings

Panel/Board members with COI must leave the room during formal discussion and initial scoring of the application with which they are conflicted. There is no provision for an individual to remain in the room but play no role in the discussion of an application. They must also remain silent if the decision on an application where they have a COI returns to the table and leave the room if asked, or volunteer to do so if the debate appears likely to be reopened. Conflicts of interest will be recorded in the minutes. Where the chair is conflicted,

a Panel/Board member will be designated as chair for those applications. All declared COI are recorded in the minutes of the meeting.

Exception to policy:

For specialist or niche areas, it may not be possible to both strictly enforce this policy and provide appropriate knowledge and expertise to inform Panel/Board discussions. In these exceptional cases, the chair must agree that it is necessary to deviate from this policy. A record with justification will then be logged in the Panel/Board meeting documentation, including the minutes.

Instances of conflict

The following are considered to be conflicts of interest for Panel/Board members or reviewers:

- are directly involved in the work that applicants propose to carry out.
- have personal relationships with applicants, defined as spouses or partners (current or past), children, siblings, parents, other close family members or close personal friends.
- work in the same school, division or department (i.e. immediate business area). For chairs this extends to the same institution as applicants. When an individual believes a conflict may exist beyond the school, division or department (or for chairs, institution) this should be declared.
- work closely with applicants, for example as collaborators, co-authors or PhD supervisors, or have done so in the last three years. There may be cases where an individual believes a conflict extends beyond the three-year period and if so, this should be declared. Being a co-author may not always preclude someone from carrying out an external review, for example in the case of publications with very high numbers of co-authors when the individual has not worked closely with the applicant, or where the publication is an editorial or an opinion or position statement from a professional group which has multiple co-authors.
- may benefit financially from the work, for example if involved with a company acting as a project partner.

This list is not exhaustive.

PEER REVIEWERS

General

Wherever possible, COI are avoided through careful selection of reviewers by PGT staff. However, some relationships may not be apparent and so the guidance below should be followed. In addition, in some specialist/niche areas of research it is likely that avoiding any conflict is impossible. In these cases, the PGT will seek to keep these to a minimum. The responsibility for disclosing any COI rests with the peer reviewer concerned and should be declared as soon as the conflict is realised. If there is any doubt about a potential COI, peer reviewers should take advice from the PGT Programme Manager. Peer reviewers have a

responsibility to return, or to confirm destroyed, any documents they receive related to an application for which they are confirmed as conflicted.