

# Health and Care Research Wales Project Grants Team Conflict of Interest Policy

## Purpose and scope

All reviewers, Panel/Board members and meeting participants involved in funding awards share responsibility for ensuring actual and potential conflicts of interest (COI) do not influence decision making. A potential conflict which is not declared or managed may result in or be perceived as having undue influence or bias. It may embarrass or put the credibility of the funding scheme and its members at risk.

The integrity of reviewers, Panel/Board members and anyone involved in funding and award decision-making processes is of paramount importance. This means that personal and professional interests must never influence, or be perceived to influence, any outcomes. Everyone involved must make themselves aware of what the Health and Care Research Wales Project Grants Team (PGT) considers potential or actual conflicts of interest and must act in accordance with this policy.

## Principles

The underlying principles of this policy are those of the Nolan committee on standards in public life. All potential conflicts must be declared. No financial conflict is too small to be disregarded. Potential conflicts of interest will be handled in accordance with our judgements and must take into account the need for decisions to be informed by expert and objective review. The risk of bias due to conflict of interest must be balanced against poor decisions arising from lack of access to appropriate knowledge and skills.

PGT considers that conflicts of interest exist where 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.

## **Conflicts of interests - funding calls**

### **Managing external reviewers' potential conflicts of interest**

It is the responsibility of each reviewer to declare conflicts of interests to PGT staff as soon as they emerge or become apparent.

PGT staff undertake COI checks based on reviewers' institutional affiliations. If no conflicts are identified, requests for review are sent to reviewers.

If a new COI as defined by PGT is declared once a review assignment has been made, the request will be withdrawn. The application will then be transferred to another reviewer. Any reviews submitted by a reviewer who is subsequently identified as conflicted are not accepted or used.

### **Detecting and declaring Panel/Board members' potential conflicts of interest**

Panel/Board members are requested to declare their conflicts of interest ahead of review allocation and Panel/Board meeting agenda scheduling. When Panel/Board members are uncertain about potential conflicts of interest, they should discuss with PGT staff, who may refer queries to the Panel/Board chair. The chair will adjudicate on such potential conflicts, making a final decision according to the PGT COI definition.

Any new conflicts of interest must be declared to PGT staff as soon as they become apparent.

In the case of Panel/Board members who declare new conflicts of interest when assigned shortlisting reviews, a new member will be allocated to review. Any submitted reviews by conflicted members will not be accepted or used.

### **Detecting and declaring observers' potential conflicts of interest**

Whilst observers play no role in the decision-making process, PGT considers that conflicts of interest and confidentiality issues exist where observers are present during application discussions and therefore the same principles as above should apply to those observing proceedings.

### **Handling COIs at meetings**

A link to this policy is provided in the Panel/Board Terms of Reference. At each meeting, PGT staff ensure that members are reminded of this COI policy through the chair's brief. PGT staff indicate all identified and potential COIs on the meeting schedule. Panel/Board members must declare any previously undisclosed COIs at the beginning of the meeting.

Members do not have access to documentation relating to applications with which they are conflicted. Such documentation includes applications, peer and public reviews and Panel/Board member reviews. Members with conflicts of interest must not be present for discussion of and must not vote on conflicted items. Declared conflicts, and the names of those leaving the room or virtual room due to these conflicts, are recorded in the meeting minutes.

When a batch of applications are submitted against a tightly defined call for funding and only one application can be funded, conflicted Panel/Board members will remain out of the room or virtual room for applications that are in direct competition with the conflicted application in question.

### **Chairs - Higher thresholds**

NB This only applies to the person who is chairing at the time. A Chair or Deputy Chair who is not chairing should follow the Panel/Board member guidance.

The Chair has a higher threshold for conflicts of interest than other Panel/Board members. They are considered to have a conflict if applicants are from the same institution, even if they are in a different school, division or department.

### **Designated Panel Members (DPMs), Designated Board Members (DBMs) and External Reviewers – Higher thresholds**

In addition to the Principles above, DPMs, DBMs and external reviewers must not be assigned to assess an application submitted by their own employing institution. They do not, however, need to leave the room.

### **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.

### **Other meetings and forums**

Other meetings and forums include, for example, monitoring reports, site visits, and email exchanges. Conflicted members should follow the spirit of this policy to judge whether they should be party to or contribute to discussions, or to be involved in any capacity.

### **Dealing with concerns about handling potential conflicts of interest**

Any concerns regarding potential conflicts of interest should be sent to [projectgrants@researchwales.info](mailto:projectgrants@researchwales.info)

## **Responsibilities**

### **PGT staff**

Directors, Deputy Directors, Assistant Directors and their teams must ensure compliance as laid out in this policy.

### **Non-PGT staff**

Chairs must comply with their duties according to this policy.

All Panel/Board members, reviewers and observers must read this policy and are required to abide by it and all other supporting guidance relevant to their role. Panel/Board members, reviewers and observers are reminded that declarations or lack of declarations of interest are governed by the Fraud Act 2006. Panel/Board members are made aware of the Fraud Act 2006 through the relevant Terms of Reference.