

## **Conflict of Interest Policy**

### **1. About this Policy**

This policy is written to ensure that conflicts of interest are acknowledged and recorded. It describes the circumstances in which individuals should declare a conflict of interest, or a perceived conflict of interest, which may affect their duties and responsibilities to Bowel Research UK, and those organisations with whom Bowel Research UK may have a relationship.

The term 'conflict of interest' is defined as any financial or other interest that conflicts with the involvement of an individual, because it could significantly impair the individual's objectivity or could create an unfair competitive advantage for any person or organisation.

The Bowel Research UK Grants Committee is responsible for reviewing research grant applications both objectively and impartially.

Expert peer review is the assessment of the quality and the value of a research grant applications by independent experts to ensure that charity funding is used effectively to maximise impact.

### **2. Who is covered by this policy?**

Everyone who works with or represents the interests of Bowel Research UK including employees, trustees, committee members, grant recipients, third party contractors and consultants and volunteers are required to follow this policy.

### **3. Duty to disclose**

A Declaration of Interests form must be completed by all those who are involved with the work of Bowel Research UK prior to appointment and this form should be updated on an annual basis.

In addition, individuals must disclose all known or potential conflicts of interest at the beginning of every meeting, or as they arise.

The minutes of meetings will record all decisions regarding conflicts of interests. Where there may be a conflict of interest the individual to which the conflict relates should withdraw from any discussions on the topic and their withdrawal should be recorded in the minutes. It is the responsibility of the chairperson of the relevant committee to ensure that this procedure is adhered to.

All conflicts of interest should be reported as soon as possible to the Bowel Research UK CEO using the Declaration of Interests form.

#### **4. Record of interests**

A Register of Interests will be kept up to date by Bowel Research UK with the names of individuals who have declared interests, together with dates and details of the interest declared.

#### **5. Types of interest**

The following is intended as a guide to the kinds of interest that should be declared. This list is not exhaustive, and if a Bowel Research UK representative is uncertain as to whether an interest should be declared, they should seek guidance from the Bowel Research UK CEO or from the chairperson of the relevant committee.

##### **5.1. Personal financial interest**

A personal financial interest involves payment to a Bowel Research UK representative personally (or exceptionally to an employee or Bowel Research UK representative) or the interest that any individual may have in the monetary transactions of Bowel Research UK. In particular, any interest that could have a direct bearing on the financial gain/loss of the individual. Examples include:

- Consultancies and other external appointments (paid and unpaid), directorships, positions in or work related to research that attracts regular or occasional payments in remuneration or other benefits arising from these.
- Any fee paid work commissioned for research, for which the member is paid in cash or in kind.
- 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) are exempt from this.
- Shareholding, or other beneficial interest, in shares of the research or healthcare industry. This does not include shareholdings through unit trusts, pension funds, or other similar arrangements where the member has no influence on financial management.
- Interests held by an individual's close family members e.g. partners, children, parents.

##### **5.2. Non-personal financial interest**

A non-personal financial interest involves payment that benefits a department or organisation for which a Bowel Research UK representative has managerial responsibility but is not received by the Bowel Research UK representative personally. The main examples are:

- A grant from a company for the running of a unit or department for which a Bowel Research UK representative is responsible.

- The commissioning of research or other work by, or advice from, staff who work in a unit for which the Bowel Research UK representative is responsible.

### **5.3. Personal interest**

A Bowel Research UK representative must declare a personal interest if he or she has, at any time, worked on a project or matter under discussion. For example:

- A public statement in which an individual has expressed a clear opinion about the matter under discussion, which could reasonably be interpreted as prejudicial to an objective discussion.
- Holding office in a professional organisation or group with a direct interest in the matter under discussion.

## **6. Investigating potential conflicts of interest**

When a possible conflict of interest arises, the CEO and/or chairperson of the Grants Committee will collect all the pertinent information contained in the Declaration of Interests form and may question any concerned parties. If the CEO determines that a conflict exists, steps will be taken to address and mitigate the conflict.

If no conflict exists, the inquiry will be documented, but no further action will be taken.

## **7. Action required when a Conflict of Interest has not been declared**

All conflicts of interest are reviewed on a case-by-case basis. The Board of Trustees has full discretion to deem what action is fitting and necessary, including disciplinary action, suspension and/or termination of employment.

## **8. Bowel Research UK Grants Committee**

Members of the Bowel Research UK Grants Committee have a particular responsibility in respect of their role on the committee and a duty to disclose conflicts of interest.

- 8.1. Details of grant applications, meeting papers and related correspondence, and the names of external referees are strictly confidential and must not be discussed with individuals outside the grants review process.
- 8.2. Discussions of a grant application between members of the Grants Committee, which occurs outside a meeting of the Grants Committee, should be declared to the chairperson and recorded in the minutes.
- 8.3. If a Grants 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 chairperson of the Grants Committee. They may subsequently be asked by the chairperson to absent themselves from a discussion of the application concerned.

- 8.4. If the advice sought by an applicant is on administrative grounds or to seek information on the status of their proposal, the applicant should be referred to the Research and Grants Manager.
- 8.5. Before each meeting of the Grants Committee or when asked to review an application, members of the Grants Committee are expected to declare any potential conflicts of interest relating to individual funding decisions to the chairperson of the Grants Committee as soon as the existence of the conflict is known or becomes apparent.
- 8.6. Where a Grants Committee member is an applicant or co-applicant on a grant application, he or she must declare an interest and withdraw from any consideration of that application. That member will not receive documents pertaining to the application, learn the identity of its referees or receive its referees' reports. He or she must retire from the meeting when the application is assessed. Details of discussion of that application will be redacted from any papers the member receives. This also applies to any Trustees who serve as members and are applicants in the grant round.
- 8.7. Grants Committee members who could be seen as in direct competition with the applicant (e.g. they are funded or applying for funding on a similar project to the proposal under discussion) or have collaborated or published with the grant applicant within the past three years, or work in the same institution, should declare an interest and may be asked to withdraw from the meeting for that application, or may be allowed to stay, but not vote on the application.
- 8.8. In cases where an individual is uncertain as to whether a conflict of interest exists or not, they should report this to the chairperson of the Grants Committee who will discuss the matter with the individual as necessary and report to the Grants Committee who will make a decision.
- 8.9. If an individual is concerned about a possible conflict of interest involving another member of the Board/Grants Committee, then he or she should raise the matter with the chairperson of the Grants Committee, or CEO, who will discuss the matter with the individual as necessary and report to the Grants Committee.
- 8.10. Where the chairperson of the Grants Committee is applying for funding, they should absent themselves from the whole meeting and not appoint any written reviewers. This should be the case whenever funding is directly attributed to the chairperson regardless of the type of applicant they are listed as (e.g. lead or joint lead applicant, co-investigator, collaborator etc). In all applications where funding is linked to the chairperson, a member of the Grants Committee will be appointed to take over the chairperson's responsibilities for that item.
- 8.11. Should the chairperson of the Grants Committee have other conflicts of interest not related to funding (e.g. institutional, co-authorship, personal or professional relationships) they should declare these interests and leave the room for the specific item(s) when they are discussed, as per the requirement for other members of the Grants Committee. Another member of the Grants Committee may be appointed to take over for these specific items.

- 8.12. Bowel Research UK 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.
- 8.13. 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 Grants Committee, the matter will be discussed by the chairperson of the Grants Committee together with a committee staff member. In cases where agreement cannot be reached through this means, the case will be referred to the Grants Committee as a whole, whose decision should be taken as final.

## **9. Updating the Policy**

The Trustees of Bowel Research UK will review this policy every two years.