



Policy on conflicts of interest in funding decisions

1. Purpose and scope

- 1.1. This policy is intended to identify and minimise actual, potential or perceived conflicts of interest when acting on behalf of Blood Cancer UK.
- 1.2. A conflict of interest is any situation in which personal or professional interests, or loyalties owed to another person or body, may (or may appear to) unduly influence or affect a Blood Cancer UK funding decision. These can include: financial interests that apply to a person, someone close to them or an affiliated body; non-financial interests, such as reputational gain; and, loyalties arising from a personal connection or duty to another person or organisation.
- 1.3. As an organisation reliant on continuing public support and to act in the best interests of patients, it is important to identify and manage potential conflicts of interests to ensure that Blood Cancer UK makes high quality funding decisions that are objective and free from bias.
- 1.4. This policy applies to employees involved in the grant-making process and external members of funding committees and panels.

2. Principles and responsibilities

- 2.1. Those acting on behalf of Blood Cancer UK are expected to be objective, open and honest, making recommendations or decisions on grants with integrity and accountability and in a way that serves the best interests of Blood Cancer UK. These principles are expected to be applied with consistency and in a way that promotes and supports their application by others.
- 2.2. It is ultimately the individual's responsibility to declare potential conflicts of interests by disclosing these to the Secretariat at the earliest opportunity. Funding committee members should complete and return the annual declaration of interests form and employees should report relevant information in one-to-one meetings with their line manager.

- 2.3. It is also the individual's responsibility to subsequently work with the Secretariat to determine whether an actual or perceived conflict of interest exists, to decide its scale and relevance, and then to manage the situation to best protect the integrity and reputation of the Charity.
- 2.4. If an individual is concerned that another person's potential conflict of interest has not been disclosed, then they should raise the matter in confidence with the Secretariat, the Director of Research, Services and Engagement, the Committee Chair or line manager, as appropriate.
- 2.5. For the sake of transparency, the nature of any conflicts of interests and where these have affected the role of a person in a decision-making process will be recorded in the minutes of the meeting, and Blood Cancer UK will be as open as possible whilst protecting sensitive information.

3. Application of principles

- 3.1. Potential conflicts of interests will usually result in the relevant person being excluded from the relevant part of any meeting where matters concerning the grant application are discussed and may not take part in any scoring or decision in relation to that grant application.

Excluded committee members will not receive any papers relating to that grant application and, should they receive them in error, must immediately destroy them and notify the Secretariat.

- 3.2. Funding committee members are automatically excluded from participating in a decision on a grant proposal if they:
 - are directly involved in the application as a lead applicant, coapplicant, co-investigator, named collaborator or any other research staff named on the grant application, even if they are a minor collaborator or someone who has provided a letter of support. If a committee member is a lead applicant or joint lead applicant on an application, that individual will also be excluded from considering any other applications that directly compete for funding;
 - have collaborated with any of the applicants or co-investigators in the last three years (in the sense that they have provided intellectual input on a project or trial);

- are personally connected to any of the applicants or co-investigators, either as a spouse or partner, close relative or previous supervisor/student;
- are a business partner of any of the applicants or co-investigators, or has a direct or indirect financial interest in the grant application;
- are employed or affiliated with the same institution or organisation as any of the applicants or co-investigators, or have been within the last twelve months.

3.3 Funding committee members may, at Blood Cancer UK's discretion, be excluded from participating in a decision on a grant proposal if they:

- are a direct competitor of any of the applicants, as disclosed by the committee member or applicant(s);
- are personally connected to any of the applicants or co-investigators as a close friend or previous laboratory colleague;
- have provided technical or general advice to the applicant(s) or co-investigators but will not be involved in study;
- have served as a reviewer or panellist for the same grant proposal under consideration by another funding body.

In any of these circumstances, and after discussion with and consideration by the Secretariat and/or the committee Chair, funding committee members may be permitted to participate in the decision but not lead the discussion of a grant application. This will be considered as a 'limited restriction' and will be noted in meeting documents issued to the Committee before the meeting and recorded in the minutes of the meeting. Committee members will be given the opportunity to raise any concerns about any potential conflicts of interest with the Secretariat and/or the Chair before the meeting.

3.4 If the Chair of the meeting is applying for funding from that same Committee or Panel, they will automatically be excluded from all applications considered at that meeting, except for those for which funding will be awarded from a budget that is separate or ring-fenced from the budget for awards for which the Chair's application relates.

- 3.5 The Secretariat must bring to the Chair's attention all relevant information concerning any form of connection between an application and a member of the Committee or Panel.
- 3.6 The fact that a conflict of interest was identified, and how it was managed, must also be recorded in the minutes or report of the meeting.
- 3.7 Employees will not participate in scoring grant proposals or final funding decisions, but may advise reviewers and panellists on budget, remit, fit with portfolio and overall research strategy.
- 3.8 Information relating to grant proposals, meeting papers, application scores and the identity of external peer reviewers is strictly confidential and should not be discussed with persons outside the review process. Discussions of a proposal between members of a funding committee that occur outside a committee meeting should be declared to the committee Chair or Secretariat.
- 3.9 We recognise that the majority of conflicts or potential conflicts will be restricted to a particular issue and will therefore not present any long-term restrictions on an individual's ability to act on behalf of the Charity. If a major conflict of interest arises that does compromise an individual's ability to continue in their position within the Charity, the matter will be discussed by the Charity's senior leadership group.