



Breast Cancer Now

Policy on conflicts of interest

1. Introduction

- 1.1 This policy applies to everyone who is involved in providing advice or making decisions relating to the review or funding of scientific research by Breast Cancer Now. It includes all funding committees and panels of the charity, their Chairs and other members. Breast Cancer Now's Secretariat may notify other individuals from time to time that they are covered by this Policy. For convenience, persons covered by this Policy are referred to as '**Scientific Advisers**'.
- 1.2 The purpose of this document 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 its committee members might interfere with their ability to work towards the furtherance of the charity's objectives.
- 1.3 The Committees are coordinated by members of Breast Cancer Now's Research Department, referred to in this document as '**the Secretariat**'.

2. What is a conflict of interest?

- 2.1 A conflict of interest may arise if non-Breast Cancer Now activities have, or could be perceived as having an impact on Breast Cancer Now's reputation or policies or, in the case of staff, interferes with commitments for Breast Cancer Now.
- 2.2 Not all non-Breast Cancer Now activity is a potential conflict of interest and may well support an individual's role with Breast Cancer Now. However, all commitments that may be a potential conflict of interest should be declared in advance or advice sought to clarify the situation.

Who is affected?

- All staff, whether on continuing or fixed term contracts
- Trustees
- Consultants
- Scientific Advisory Board (SAB)
- Scientific Advisory Group
- Generations Oversight Body
- Tissue Bank Groups
- In certain circumstances family members or close personal contacts who have links with organisations linked to Breast Cancer Now's activities or policy interests
- Scientific advisors

2.3 External conflicts of interest

- 2.3.1 Interests which should be disclosed by such individuals include:
- 2.3.2 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) should be held exempt from this.
- 2.2.3 Potential conflicts of interest highlighted by declarations of interest, including consultancies and appointments, may normally be resolved by the individual concerned not participating in the relevant decision and being restricted in access to information.
- 2.2.4 Breast Cancer Now has set out procedures for evaluating conflicts of interest in its Code of Conduct which is provided to all committee members.

2.4 Conflicting interests relevant to a particular proposal

- 2.4.1 An individual will normally be deemed to be connected with a grant proposal if the individual is any of the below:
- Are an applicant, co-investigator or collaborator on an application
 - Belong to the same institution as an applicant or co-investigator
 - Have co-authored a paper with the lead applicant in the last three years.
 - A named collaborator; or a recent collaborator with the listed main applicant and/or co-applicant(s) of a grant application
 - A relative of one of the grant applicants (“relative” for this purpose includes, but is not limited to, spouse or partner (current or past), children, siblings and parents);
 - A personal friend of one of the applicants
 - A business partner of one of the grant applicants; or a member or employee of the same university, or other institution, as the grant applicant or co-applicant.
 - Has a direct or indirect financial interest with a grant application being considered
 - Has a competitive interest with a grant application being considered which may result in a strong decision bias during the time of his/her commitment for the committee
 - Is aware of any other issues (whether academic, scientific, financial, business, personal or otherwise) that might give rise to a conflicting interest
- 2.4.2 A Scientific Adviser should be aware that they are appointed to a committee as an individual and not as a representative of an organisation by which they are employed or with which they have significant contracts or connections.
- 2.4.3 A Scientific Adviser should not misuse information gained in the course of their role for personal gain or use their position to promote their personal interests.

2.5 Declaration of interests

- 2.5.1 Upon appointment a Scientific Adviser shall complete a declaration of interests form setting out any Conflicting Interests. These Interests will be added to Breast Cancer Now’s Register of Interests of Scientific Advisers. This declaration shall include details of remuneration for any post mentioned in clause 2.3
- 2.5.2 The Secretariat will require Scientific Advisers to update their Declaration of Interests annually
- 2.5.3 Any disputes regarding requested activities involving committee members will be discussed with the Chief Executive.

2.5.4 Panel members (including trustees who serve on panels) should also adhere to the spirit of this document and declare any other interests which they feel may be a source of conflict, or which might be perceived to conflict, with the interests of Breast Cancer Now. This includes interests held by the panel members' spouse or children. In all such cases, the conflict must be declared to the SAB secretariat as soon as it becomes evident.

2.5.5 If a Scientific Adviser has any doubt about whether an interest is a Conflicting Interest they should seek guidance from the Chair of their committee or the secretariat.

3. Managing conflicts of interests

3.1 Breast Cancer Now 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.

3.2 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 a funding committee/panel, the matter will be discussed by the chair of the committee together with the secretariat. In cases where agreement cannot be reached through this means, the case will be referred to the committee as a whole, whose decision should be taken as final.

3.3 Members of funding committees are expected to declare any potential conflicts of interest relating to individual funding decisions to the committee secretariat before the meeting wherein they will be discussed, or during the meeting as soon as the existence of a conflict becomes apparent.

3.4 The Chair of the Committee and the Secretariat shall decide what action should be taken to deal with the Conflicting Interest. This may include:

3.4.1 Automatic exclusion from participation in funding decisions

Where a panel 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 deleted from any papers the member receives. This should also apply to Trustees who serve as panel members and are applicants in the grant round.

3.4.2 Exclusion at Breast Cancer Now's discretion

Individuals may be excluded from Committee discussions at the discretion of Breast Cancer Now in a number of circumstances, of which the following are examples. If they:

- Are a direct competitor of the applicant;
- Have acted as an external referee or on a committee or panel in respect of a proposal at a time when this was being considered by another funding body.

3.5 If an individual becomes aware of any other matter that would reasonably be expected to give rise to, or be viewed as, a conflict of interest (whether academic, scientific, financial or otherwise) then he or she must declare the matter to the secretariat of the committee before the meeting or, if not practicable, as soon as the potential conflict becomes apparent at the meeting.

3.6 The Secretariat (or where there is doubt as to whether an individual should be excluded, the Secretariat in consultation with the Chair, or Deputy Chair when the Chair is conflicted) will determine whether the individual should:

- Be permitted to take a full part in the meeting;
- Be permitted to comment on the application and participate in discussions but not present the application to the committee
- Be permitted to comment on the application and participate in discussions but not take part in the decision; or
- Absent himself or herself from the relevant part of the meeting.

3.7 The secretariat will bring to the Chair's attention all relevant information concerning any form of connection between an application and a member of the committee.

4. Confidentiality and transparency

4.1 Details of funded grants, applications, meeting papers and related correspondence and the names of external referees are strictly confidential and should not be discussed with persons outside of the committee and the Secretariat. Scientific Advisers will also undertake to keep all documents secure and return them to the Secretariat or dispose of them appropriately.

4.2 Where committee members feel it necessary to discuss an application prior to the meeting, this should be declared to the Chair.

4.3 If an individual is approached by an applicant for advice on an application during or after the peer review process, the individual must not engage in discussion and disclose this incident to the secretariat of the committee

4.4 If an individual is approached by an applicant for technical advice on an application in his or her area of specialisation, the individual may provide such advice but must disclose this fact to the secretariat of the committee. The individual may be excluded from all or part of the meeting at which the application is considered.

5. Cases of uncertainty

5.1 If an individual is in any doubt as to the relevance of an interest that he or she has, such interest should be disclosed to the secretariat before the meeting or, if not practical, as soon as the potential conflict becomes apparent at the meeting.

5.2 The Secretariat will consult as necessary and the Chair, or the Deputy Chair (if the Chair is conflicted), shall make a decision.

6. Matters other than those concerning funding decisions

6.1 Except to the extent permitted explicitly by any other part of this code, individuals must absent themselves from the relevant part of any meeting where matters concerning their interests are discussed and may not take part in any decisions taken relevant to such interests.

7. Raising concerns about the conflicts of interests of other individuals

7.1 An individual who is concerned about another individual's potential or actual conflicts of interest should raise the matter as set out below:

- Issues concerning a member of the Committee should be raised with the Chair or secretariat of the Committee
- Issues concerning Breast Cancer Now staff should be raised with the Chair
- Issues concerning the Chair should be raised with the Deputy Chair
- Issues concerning both the Deputy Chair and the Chair should be raised with the Director of Research and the Research Funding Manager.

7.2 Committee members should read this policy in conjunction with the Terms of Reference, Code of Conduct and the Operational Guidelines which are available from the office on request.

8. Staff and Consultants

- 8.1 Any disputes regarding requested activities involving staff and consultants will be discussed with the Chief Executive. If s/he is unable to resolve the situation the matter will be referred to the Trustee Board whose decision will be final.
- 8.2 Any other contravention of the above guidelines will be regarded as a disciplinary offence and the procedure outlined in the non-contractual disciplinary procedure will be followed

9. Trustees

9.1 Any disputes regarding the above will be resolved by a committee consisting of the Chief Executive and two other Trustees. Trustees are reminded of charity law concerning benefit.

10. Tissue Bank Groups

10.1 All groups established under the agreement in respect to the formation of the Breast Cancer Now Tissue Bank are bound under this agreement to work as set out in the Tissue Bank Terms of Reference. These Groups are the Tissue Bank Advisory Council, the Tissue Access Committee, and the Operations Group. The Tissue Bank Terms of Reference includes a conflict of interest policy that non Breast Cancer Now Staff and Trustees on the Tissue Bank Groups must adhere to. Any Breast Cancer Now staff or Trustees that sit on any of the Tissue Bank Groups must adhere to both Breast Cancer Now's general conflict of interest policy and the tissue bank conflict of interest policy."

Use of Animals in Scientific Research Policy

Introduction

Breast Cancer Now is a member of the Association of Medical Research Charities (AMRC). We support the principle of using animals in research when it is necessary to advance understanding of health and disease and to develop new treatments. This research only takes place where there is no alternative available. This is a requirement by law. We have signed up to the [Concordat on Openness on Animal Research in the UK](#) and support this [statement](#) as set out on the AMRC website.

What we expect from our researchers

If you receive funding from Breast Cancer Now, please remember the following:

- Your grant must not be used for any research on animals which has not been approved and set out in the grant application.
- Where possible you should adopt procedures and techniques which avoid the use of animals. Where this is not possible you should use the minimum number of animals considered necessary to achieving a valid result in any experiment. You should adhere to the principles of the 3Rs (<http://www.nc3rs.org.uk>) by using the minimum number of animals possible and causing the least suffering. Adhering to these principles may involve the use of animals of a higher quality or species.
- You must comply with all applicable laws, regulations and guidelines, including but not limited to the Animals (Scientific Procedures) Act 1986, relating to the use and handling of live animals in relation to the Project.
- You must not commence any activities under the Project that require the use of animals until all the necessary licenses and certificates have been obtained.

What our researchers can expect from us

- When communicating about your work, such as on our website or in press releases, we may mention that the research involves animal work, unless we are specifically requested not to.
- We will share data on how much animal research we fund with the AMRC. The AMRC will also monitor our compliance with the Concordat.
- Communicating about work which involves the use of animals can be sensitive, and there are some that may seek to misuse information about your research. We can help you talk about your work in the most effective way. If you are unsure of how to best communicate your animal research to the public, please get in contact with the Research Communications team for advice and support

Open Access Policy

Our aim is that by 2050, no one will die from breast cancer. We will do this by finding ways to prevent the disease, improving early diagnosis and developing new treatments for all types of breast cancer. We believe this can be achieved faster by making our research open and freely available to everyone.

From 1 April 2015 Breast Cancer Now:

- Requires electronic copies of any research articles that have been accepted for publication in a peer-reviewed journal, and that acknowledge our funding in whole or part, to be made available through Europe PubMed Central (Europe PMC) as soon as possible and no later than 6 months after publication.
- Encourage Breast Cancer Now funded researchers to select publishing routes that ensure the work is available immediately on publication in its final published form, wherever such options exist for their journal of choice and are compliant with our policy*.
- Encourage - and where an open access article processing charge is paid to the publisher, require - authors and publishers to licence research papers using the Creative Commons Attribution licence (CC-BY)**, so they may be freely copied and reused (for example, for text- and data-mining purposes), providing that appropriate credit is given to the original authors.
- Encourage researchers we fund to maximise the opportunities to make all their results accessible and available for free. This includes taking advantage of online open publishing platforms and repositories, and ensuring dissemination of negative or confirmatory results.

Breast Cancer Now is working in partnership with a number of medical research charities to provide funds for Open Access, by forming the Charity Open Access Fund (COAF). This fund will enable a greater number of Breast Cancer Now's supported publications to be made immediately available at the point of publication.

As a result of the COAF, Breast Cancer Now has various funding options to support the payment of APC's:

For Project, Pilot, Fellowship and PhD grant holders:

1. Researchers based at one of the 36 UK institutions listed [here](#) can apply to their host institutions to access this fund.
2. Researchers that are not based at an institution which receives support from the COAF, may [contact](#) Breast Cancer Now directly to organise payment of APC's.

For Centre, Unit or Programme grant holders:

3. Publication costs should be met within current grant funding.

Alternatively, authors can comply with our policy by self-archiving their publication in Europe PMC within 6 months, if the publisher permits*.

For further information about this policy, please contact Grants_Admin@breastcancernow.org

You can read more about COAF here: www.wellcome.ac.uk/COAF .For specific information about administration of open access fees via COAF please contact openaccess@wellcome.ac.uk.

*Researchers can determine which journals are compliant with this policy by referring to the [RoMEO database](#).

**This requirement applies only to original research papers submitted for publication from 1 April 2015, where Breast Cancer Now funds have been used to meet an article processing charge.



Publication, Communication and Engagement Policy

Introduction

Breast Cancer Now has an obligation to make available information about the work that it funds. This policy covers the expectations and responsibilities of Breast Cancer Now-funded researchers when publishing and publicising your work.

Acknowledging Breast Cancer Now

In any oral or written report or poster presentation of results or otherwise relating to the Research, the author must acknowledge the support of Breast Cancer Now and, where possible, display the Breast Cancer Now logo.

All references to Breast Cancer Now funded work placed on websites, electronic bulletin boards and similar must state clearly that the work is funded by Breast Cancer Now and, where practical, should include a link to Breast Cancer Now's website, www.breastcancernow.org.

Where possible, Breast Cancer Now's logo should be visible in laboratories, offices or other locations where funding is received by Breast Cancer Now. This is expected of our long-term Grants. Please get in touch with the Brand and Communications teams if you are unsure of how to comply.

Publishing your work

Breast Cancer Now requires researchers to disseminate the results of the research that it funds in the usual manner, for example by publication and by presenting at meetings. Breast Cancer Now may sometimes request the publication to be delayed to meet reasonable requirements for the protection of Intellectual Property Rights, fundraising and other matters, but this will not be applied unnecessarily.

Grant Holders must provide Breast Cancer Now with details of all publications arising from their Breast Cancer Now Research Grant, whether wholly or partly funded (email grants_admin@breastcancernow.org), and should supply a copy of any such publications.

These details should be provided before submitting the paper for publication. Grant Holders should then update Breast Cancer Now as the paper is submitted, accepted and then published. This ensures that Breast Cancer Now is kept fully informed of all results entering the public domain and that there is sufficient notice to arrange any publicity.

Grant Holders are required to deposit an electronic copy of peer-reviewed, published papers arising from their Breast Cancer Now funded work in the Europe PubMed Central database within 6 months of publication. Please refer to [Breast Cancer Now's Policy on Open Access](#) for details on how to comply.

The following standard format is suggested for inclusion in the acknowledgement section of any publication: 'This work was supported by Breast Cancer Now'. Where appropriate, you should indicate where individuals hold specific, named fellowships.

Publicising your work

In order to safeguard future voluntary income it is essential that Breast Cancer Now is widely known and respected among the scientific community, the media and among fundraisers and the general public. We are therefore keen to ensure that all opportunities to promote Breast Cancer Now are fully exploited and that the generosity of Breast Cancer Now's supporters is recognised across all Breast Cancer Now's activities and funded research. Both you and your Host Institution must co-operate with Breast Cancer Now over any publicity or fundraising activity arising from Breast Cancer Now-funded research.

In order to support our researchers in the dissemination of their research, we have a press office and research communications team that can help you to promote your research findings. We will work with you to help publicise your work in the local, national or international media, and to public or targeted scientific audiences, including online and in social media. So that we can give you appropriate support, please let Breast Cancer Now know about your results as soon as possible, and as far in advance of publication as you can.

Where Breast Cancer Now is the main funder of the research, Breast Cancer Now reserves the right to lead on publicity. This constitutes first-refusal and does not mean that every piece of research will be press released.

In all cases, including where Breast Cancer Now is not the main funder, Grant Holders and the Host Institution are required to contact Breast Cancer Now's Press Office (email press@breastcancer.org, tel: 020 7749 4115, out of hours: 07436 107914) prior to any publicity releases about Breast Cancer Now-funded research. Where Breast Cancer Now is the main or a joint-lead funder this should be prior to a release being drafted.

When speaking publicly about research funded by Breast Cancer Now, and particularly when speaking to representatives of the media, researchers should ensure that they are recognised as a Breast Cancer Now funded scientist. However, researchers should not speak to the media as a 'Breast Cancer Now funded scientist' without prior consultation with the Breast Cancer Now Press Office. If Breast Cancer Now asks a researcher to act as a spokesperson, we will provide briefings and support as needed.

Breast Cancer Now reserves the right to use data or other material from research that it funds as part of its fundraising or publicity activities, and as part of submissions to the National Cancer Research Institute (NCRI).

In publicity work, Breast Cancer Now will adhere to any embargo time and date placed on a publication by the journal in which it is being published.

Engagement with the breast cancer community

We aim to bring our research and breast cancer community together whenever we can. We are proud of the research that we fund and are keen to show our supporters how their donations are used. To this end Breast Cancer Now may undertake visits to Breast Cancer Now Grant Holder's research groups. These visits may include Breast Cancer Now's staff,

Trustees, Science Strategy Committee members, technology transfer agents, fundraisers, spokespeople, local politicians and supporters. Requests for assistance from researchers will be reasonable and appropriate and will be agreed with the Grant Holder in advance.

We hope that all of our Research Personnel funded via Breast Cancer Now's grants, regardless of their place of work, will actively support Breast Cancer Now's fundraising and engagement initiatives, local community work and national campaigns when asked to do so. Contribution could be by hosting lab tours, speaking at fundraising events, volunteering or actively participating in events. For more details as to how you can volunteer and participate in events see www.breastcancernow.org/get-involved

The public activity described above can sometimes generate publicity. Where possible Breast Cancer Now will contact you to make you aware of this beforehand; however, this is something that cannot always be foreseen.

Supporting Breast Cancer Now's peer review process

Grant Holders are expected to respond positively and punctually to requests to referee Breast Cancer Now Grant applications.



Conference Travel Guidelines

Introduction

In order to support the dissemination of Breast Cancer Now-funded work within the scientific community, Breast Cancer Now may supplement your **Response-mode grant** budget with an additional 'conference travel' award. These funds sit separately from the main research budget and any claim for reimbursement must meet specific criteria detailed below.

In order to qualify for reimbursement the attendee **must** present Breast Cancer Now funded work, either in the form of a poster or oral presentation. The charity will refund costs on receipt of an invoice accompanied by a completed expenditure breakdown form, and will require an abstract to be submitted.

Response-mode Project grants

Breast Cancer Now may provide £1000 for the costs of travel, registration and accommodation for one international conference and £300 per year for the costs of travel, registration and accommodation for national conferences. We expect that, where possible, the conference travel budget is used to fund the named researcher on the grant.

Response-mode PhD studentships

Breast Cancer Now may provide £1000 for the cost of travel, registration and accommodation for one international conference and £300 per year for the cost of travel, registration and accommodation for national conferences.

As the conference travel budget should form part of the student's career development plan the charity will only reimburse travel costs for the named researcher. PhD students may also use the award for travel for training purposes (in new techniques, for example).

Response-mode Scientific fellowships

Breast Cancer Now may award a total of £4500 for travel: £3000 for the costs of travel, registration and accommodation for three international conferences and £1500 for the costs of travel, registration and accommodation for up to five national conferences.

Response-mode Pilot grants

No conference travel costs are awarded for pilot grants.

Guidelines for booking conference travel

Breast Cancer Now receives all of its funding through charitable giving. As such it is necessary that costs are minimised wherever possible, and we ask that the following guidelines are observed when booking travel:

- i. Travel and/or accommodation should be arranged at least two weeks in advance
- ii. Where relevant, travel should be standard/economy class (except where cheaper options are available)
- iii. Please note that on many occasions two single tickets may be cheaper than a return
- iv. Breast Cancer Now reserves the right to refuse payments for any costs it deems to be unreasonable
- v. Breast Cancer Now will only reimburse the travel costs for one attendee per presentation for each conference. Other attendees, including co-applicants, collaborators and unnamed researchers, may not claim from this budget
- vi. The Conference Travel Budget is available throughout the grant and up to 12 months after the grant end date.