



CONFLICTS OF INTEREST POLICY FOR INDIVIDUALS INVOLVED IN RESEARCH FUNDING DECISIONS

1 Introduction

- 1.1 This policy applies to everyone who is involved in providing strategic advice or making decisions connected with the review of scientific research or research resources by Breast Cancer Now. It includes all funding committees and panels and other individuals involved in the application process, including external reviewers and Biobank advisers, collectively known as 'advisers'.
- 1.2 All relevant individuals have a responsibility to be aware of the potential for a conflict of interest. All conflicts of interest, whether actual or potential, should be declared at the earliest possible opportunity.
- 1.3 This policy is managed by Breast Cancer Now's research team, including the director of research, support and influencing collectively here referred to as 'the secretariat'.
- 1.4 Breast Cancer Now has set out a code of conduct for individuals involved in research funding (See Appendix A).

2 What is a conflict of interest?

- 2.1 A conflict of interest is any situation in which personal interests or loyalties could, or may, prevent the person with the conflict from making a decision in the best interests of the charity.
- 2.2 *External conflicts of interest*
 - 2.2.1 Interests which should be disclosed by such individuals include:
 - Financial interests including equity interests 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.
 - Loyalties including a personal connection or duty to another person or organisation including a past employer, past student, family member, friend, close colleague or collaborator.
- 2.3 *Conflicting interests relevant to the provision of advice*
 - 2.3.1 Breast Cancer Now seeks impartial scientific advice on research proposals and access to research resources, and as such an individual should advise if they have a connection in any of the following ways:
 - Are an applicant, co-applicant or collaborator on a proposal to Breast Cancer Now in the same funding round
 - Belongs to the same institution as an applicant or co-applicant
 - Have co-authored a paper with the lead applicant(s) 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 1 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 applicants; or a member or employee of the same university, or other institution, as the applicant or co-applicant
- Has a direct or indirect financial interest with an application being considered
- Has a competitive interest with an application being considered
- Is aware of any other issues (whether academic, scientific, financial, business, personal or otherwise) that might give rise to a conflicting interest

2.3.2 Deciding whether a conflict of interest is low risk is a judgement of the secretariat in consultation with the chair(s) as appropriate. It is not possible to give a definitive view of this, as it will depend on the relevant circumstances. The secretariat and chair(s) must take all relevant factors into account and be ready to explain their approach if asked. The following examples illustrate some potential situations and the considerations that may be involved:

- *Example 1:* Where a joint publication has a large author list and where the committee member or external reviewers have not collaborated directly
- *Example 2:* Where researchers are linked through a joint grant but the grant is held by a large consortium of relatively independent researchers

Committee members and external reviewers are required to declare how closely they are connected with the applicants in this regard. The secretariat and chair(s) will judge whether it presents a significant conflict of interest based on the information provided by the committee members, external reviewers and the Secretariat.

- 2.3.4 All advisers should be aware that they are being approached as an individual with specific expertise and not as a representative of any organisation by which they are employed, or with which they have significant contracts or connections.
- 2.3.5 An adviser must maintain confidentiality and should not misuse information gained during their role for personal gain or use their position to promote their personal interests. Advisers will be asked to sign a confidentiality agreement when they join a committee or group.

3 Managing conflicts of interests

- 3.1 Breast Cancer Now recognises that most 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 the matter will be discussed by the chair of the committee and the associate director research and/or the director of research, support and influencing.
- 3.3 The secretariat, with reference to the chair of the committee as appropriate, shall decide what action should be taken to deal with the conflicting interest. This may include:
- 3.3.1 *Automatic exclusion from participation in funding decisions*
Where a committee member is an applicant or co-applicant on a grant application, they must declare an interest and will not be party to any information connected with assessment of the application. Review documentation will not be sent to the member and they must retire from the meeting when their application is assessed. If the Chair is the lead applicant, they will be asked to absent themselves from the entire meeting and the deputy chair will assume the chair's role.
- 3.3.2 *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 including if they:

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

3.4 The secretariat or, as appropriate, the secretariat in consultation with the chair, or deputy chair (if the chair is conflicted) will determine whether the individual should:

- Be permitted to provide their assessment as an external reviewer
- Be permitted to take full part in the meeting
- Be permitted to comment on the application and participate in discussions but not lead on presenting the application to the committee
- Be permitted to comment on the application and participate in discussions but not take part in the scoring or decision-making
- Absent himself or herself from the relevant part of the meeting

3.5 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. Advisers will also undertake to keep all documents confidential and dispose of them securely.

4.2 Where advisers feel it necessary to discuss a proposal with another member, or a specialist in the relevant field, prior to the meeting, this should be declared at the meeting.

4.3 If an adviser 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. The adviser may be excluded from all or part of the meeting at which the application is considered.

4.4 If an adviser is approached by an applicant once a proposal has been submitted, the adviser must not engage in discussion and must disclose this incident to the secretariat.

4.5 If advisers consider their specialist advice could enhance the conduct of funded research, or future submissions, they should inform the Secretariat who will provide their contact details to the applicants.

5 Raising concerns about the conflicts of interests of other individuals

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

- Issues concerning a member of the committee should be raised with the secretariat
- Issues concerning Breast Cancer Now staff should be raised with the director of research, support and influencing

6 Biobank groups

Biobank committees and groups are bound under this agreement to work as set out in the relevant Terms of Reference.

7 Document information

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Appendix A

Code of conduct for individuals involved in research funding and governance

The purpose of this document is to set out what is expected of individuals connected with Breast Cancer Now funding, including committee members and scientific advisers.

Breast Cancer Now relies extensively on the independent advice and support of experts as it makes decisions about funding and its research strategy. Advisers and committee members must therefore agree to:

- Objectively and impartially contribute to the development of scientific policy and the assessment of funding applications
- Commit to full participation in meetings, listen to others and contribute positively to the discussions
- Examine and challenge, if necessary, the assumptions on which scientific advice is formulated
- Share the general responsibility of considering the wider relevance of their decisions to the field of breast cancer research

In doing this, advisers and committee members should:

- Strive to attend all meetings or provide apologies if unable to do so
- Prepare for the meeting by reading the paperwork in advance and undertaking any due diligence
- Contact the committee secretariat if you have any uncertainty of what is expected of you
- Respect confidentiality around paperwork and any discussions at meetings. Specifically, securely store, and do not disseminate, any paperwork (whether in hard copy or sent electronically) and securely destroy when no longer required
- Not input any content from a Breast Cancer Now funding application into generative AI tools
- Refrain from discussing any aspects of the deliberations or recommendations of Advisers or Committees directly with applicants. Instead, if appropriate, Breast Cancer Now staff will provide verbal or written feedback according to current practices
- Declare any conflicts of interest as soon as these become apparent to allow Breast Cancer Now staff to advise on any necessary action(s)
- Where necessary, complete the annual declaration of interests form in a timely manner