Policy on the management of conflicts of interest in the assessment of grant applications

1. **General**

    a) This policy relates to all members of Brain Research UK Scientific Advisory Panel (SAP).

    b) The purpose of this document is to protect the charity and those who work for it from any perception, real or otherwise, that the external interests and affiliations of its SAP members might interfere with their ability to make impartial, independent recommendations relating to the funding of research. This document aims to provide transparency in the processes used to manage conflicts.

    c) A conflict of interest is defined as any financial, personal, professional or institutional interest or connection of any individual SAP member which may, if undeclared, expose the SAP and its recommendations to accusations of bias and inappropriate influence in peer review or assessment, funding recommendations or scientific advice to Brain Research UK.

    d) This policy aims to ensure that perceived conflicts are identified and recorded, and that they are dealt with fairly, consistently and transparently.

2. **Confidentiality and discussions outside the review process**

    a) Details of grant applications, meeting papers and related correspondence, and the names of external referees are strictly confidential and should not be discussed with persons outside the review process.

    b) Any related discussions between panel members that occur outside a committee meeting should be declared to the Chair of the SAP.

    c) If an SAP member is approached by an applicant for technical advice on an application, he or she may provide advice, but must report this to the committee chair and secretariat. They may subsequently be asked by the Chair to absent themselves from a discussion of the application concerned.

3. **Identification and management of conflicts of interest**

    a) SAP members – excluding the Chair - may apply for funding under competitive funding calls. Where SAP members intend to apply under a particular call (as Lead applicant or a Co-applicant), they must declare this to the Chair or Secretariat at an early stage.

    b) Pursuant to 3a above, SAP members submitting an application will usually be required to recuse themselves from further involvement in the assessment of that round of applications.

    c) The Chair is not eligible to apply.

    d) Levels of conflict and process for management:

Nature of conflict	Recourse
Level 1 • SAP member is applicant or co-applicant (Including Supervisor or Co-supervisor in the case of Studentship applications).	SAP member will be recused from the assessment of this round of funding applications. Details relating to discussion of that application will be removed from papers received by that SAP member.

• SAP member is a close relative or business partner of the Lead applicant or Co-applicant.	
Level 2 • SAP member is named as a Collaborator i.e. not directly involved in management of the proposed project but contributing specific expertise, services, samples etc. • SAP member is within the same research group as panel member. • SAP member has active, recent (within two years) or planned collaborations with the Lead applicant or Co-applicant. • DIRECT COMPETITOR. SAP member has a competitive interest with a grant application which may result in a decision bias.	SAP member may remain in the process but does not contribute to discussions about the application in question, does not score or vote on that application and may not receive paperwork relating to that application. At the discretion of the Chair, they may be asked to absent themselves from the discussion about the application. Details of the discussion may be removed from papers received by that SAP member. If the Chair has a Level 2 conflict, he or she may remain in the process as a SAP member but an Acting Chair will be appointed.
Level 3 • SAP member is within the same Department or Faculty as the Lead applicant or Co-applicant. • SAP member has historic (greater than two years) collaborations with the Lead applicant or Co-applicant.	SAP member may take part in discussions relating to the application but should not take lead role.
Level 4 • SAP member is from the same institute as the Lead applicant or a Co-applicant but different Faculty/Department, no collaboration.	Conflict should be noted but SAP member should usually be able to play a full role in the assessment of the application.

e) When funding applications are received, the Secretariat will initially vet the applications to identify any apparent conflicts. A list of applications, showing Applicants, Co-applicants and Collaborators will be circulated to SAP members who will be asked to flag any additional conflicts.

f) Conflicts will then be recorded and assessment of applications will proceed, with conflicts managed according to the scheme in 3d above.

g) If any further conflicts become apparent during the process, these should be declared as soon as possible.

h) If an SAP member is uncertain as to whether a conflict exists, they should report this to the Secretariat who will confer with the Chair.

i) Following the conclusion of each round of funding, the Secretariat will prepare a report listing the conflicts that have arisen and detailing how they were managed. This will accompany the funding recommendations presented to the Board.

4. Co-option of additional panel members

When SAP members are recused from Panel, consideration will be given to the need to co-opt additional members to that particular grant panel to ensure that the panel has the necessary expertise.

5. Raising concerns about the conflicts of interest of others

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

a) Any issue concerning an SAP member should be raised with the Chair or the Secretariat.

b) Any issue concerning Brain Research UK staff should be raised with the Chair.

c) Any issue concerning the Chair should be raised with the Board.

Last updated June 2019

Due for review June 2021