

# **School for Primary Care Research**

# **Conflict of Interest Policy**

It is essential that the personal and institutional interests of those involved in reviewing applications or taking part in Board decision making do not influence the processes. All those involved share responsibility for ensuring this. Accordingly, it is important that panel and board members or observers, peer reviewers, public reviewers and public members of panels (hereafter reviewers) are aware of what constitutes a potential or actual conflict of interest (COI).

#### General

The responsibility for disclosing any COI rests with the reviewer concerned and should be declared as soon as the conflict is realised. Examples of instances of COI are detailed below. In some specialist/niche areas of research it is likely that avoiding any conflict is impossible. In these cases, the SPCR will seek to keep these to a minimum. If a reviewer remains in any doubt about a potential COI they should take advice from the SPCR Senior Scientific Manager who will consult the Board/panel chair as required. Reviewers must decline to act as Lead Assessor/Designated Panel Member where there is a COI. Reviewers have a responsibility to return, or to confirm destroyed, any documents they receive related to an application for which they are confirmed as conflicted.

## Procedure at meetings

Reviewers with COI must leave the room during formal discussion of the application with which they are conflicted. There is no provision for an individual to remain in the room but play no role in the discussion of an application. They must also remain silent if the decision on an application where they have a COI returns to the table and leave the room if asked, or volunteer to do so if the debate appears likely to be reopened. Where the chair is conflicted, a panel member will be designated as chair for those applications. All declared COI are recorded in the minutes of the meeting.

#### **External Review**

Wherever possible, COI are avoided through careful selection of reviewers by applicants and the SPCR. However, some relationships may not be apparent and so the guidance below should be followed. In addition, in some specialist/niche areas of research it is likely that avoiding any conflict is impossible. In these cases, the SPCR will seek to keep these to a minimum. The responsibility for disclosing any COI rests with the peer reviewer concerned and should be declared as soon as the conflict is realised. If there is any doubt about a potential COI, peer reviewers should take advice from the SPCR Senior Scientific Manager.

## Instances of conflict

## 1. Originators and co-applicants

Originators and co-applicants are always considered conflicted and must follow the procedure above. They may be told the outcome of the discussion at the close of the meeting but must wait for the formal written outcome letter from the SPCR before sharing this decision with anyone outside the meeting. Reviewers' comments (both internal and external) will not be available to the panel member concerned, either within their agenda papers or as tabled papers.

# 2. Collaborators

Active collaborators in the proposed research should leave the room while the application is considered. Current collaboration with any applicant in research other than the specific project under consideration or any historical collaboration (up to four years previously) with the research team



should be declared and the decision whether this represents a significant COI is guided by discussion with the SPCR Senior Scientific Manager.

#### 3. Reviewers from the same institution as the prospective researchers

Reviewers from the same institution as the research team should leave the room if they are closely associated with the department or unit concerned. In some circumstances, where there is no close association, the decision whether this represents a significant COI is guided by discussion with the CCF and/or chair or other programme authority. A current or recent past line management relationship is always seen as a COI.

## 4. Competitive and commercial interests

Reviewers must never derive academic or commercial competitive advantage from knowledge they acquire in the process of reviewing applications. They are considered conflicted if they are involved in or planning to undertake any academic or commercial activity which is like that covered by the application. Reviewers must declare anything that would be likely to compromise the independence of their opinion. Examples where declarations must be made are included below:

- personal remuneration from organisations including employment, pensions, consultancies, directorships and honoraria
- shareholdings and other financial interests in companies held by reviewers or their close family
- research grants, including major research collaborations, on a competing research topic
- non-financial or unremunerated involvement with organisations, such as directorships of companies or organisations which might benefit from support by the NIHR
- where the panel member has previously acted as a panel member when the application was being considered by another funding body.

This is not an exhaustive list, and reviewers are encouraged to declare all potential conflicts

## 5. Personal relationships

Where reviewers have a close personal relationship with an applicant they should declare an interest and leave the room when the application is under consideration