

Policy on Conflicts of Interest in Research Funding and Monitoring

1. Policy statement and purpose

1.1. This policy is intended to:

- identify and minimise actual, potential or perceived conflicts of interest when individuals are providing expertise and advice to Blood Cancer UK that influences application review, funding decisions and post award monitoring;
- assist all individuals involved and the Secretariat in managing any conflicts of interest that do arise.

1.2. A conflict of interest is any situation in which personal or professional interests, or loyalties owed to another person or body, could, or could be seen to, unduly influence or affect Blood Cancer UK decision making. 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 one that seeks 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, and that are seen to be, fair, objective and free from bias. By doing this, we also aim to protect the reputation of Blood Cancer UK and those involved in funding decision making.

2. Scope

2.1 This policy applies to any individual who provides advice and assistance to Blood Cancer UK in connection with any application for charitable funding for scientific or clinical research, or who is otherwise involved in Blood Cancer UK's grant funding or post award monitoring processes. It covers external peer reviewers, all members of Blood Cancer UK's funding

committees and Patient Voice Grant Advisory Network (PVGAN), Blood Cancer UK employees and Trustees, and any other individuals as appropriate.

3. Definitions

- **Applicant roles** are defined in the Appendix.
- **Disclosable Interest** is an external personal or professional interest held, or loyalties owed to another person or body, that could, or could be seen to, unduly influence Blood Cancer UK decision making. These can apply to a person, someone close to them or an affiliated body.
- **Funding Decisions** include the awarding, release of contingent funding or the withdrawal of funds for research awards.
- **Immediate Family** includes a spouse, parent, sibling, child or other dependent.
- **Monitoring** includes post award progress monitoring by Blood Cancer UK committees and patient representatives and subsequent provision of formal feedback and advice to funded researchers.
- **Patient Voice Grant Advisory Network (PVGAN)** is a community of people affected by blood cancer, experts through lived experience, who are actively involved in our research funding activities.
- **Secretariat** includes all Blood Cancer UK employees involved in managing the processing of funding applications, all stages in the administration of funding committee meetings, managing the outputs from those meetings and taking any funding recommendations to the Research and Mission Committee.

4. Principles and responsibilities

- 4.1 All individuals with long term influence over Blood Cancer UK application review, funding decisions and post award monitoring must declare any disclosable interest that have the potential to give rise to a conflict of interest on appointment, and annually thereafter. A register of interests will be kept up to date by Blood Cancer UK. This includes all individuals appointed as members of a funding or monitoring committee, members of the Secretariat and Trustees of Blood Cancer UK. In addition, all funding

committee members who are currently receiving funding from Blood Cancer UK or have done so in the past, will be detailed in the charity's annual report and accounts.

- 4.2 All individuals invited to participate in the review of individual funding applications or in one off research funding or monitoring related decision making including external peer reviewers and PVGAN members will be required to declare conflicts of interest at the point they are invited to participate in that specific activity.
- 4.3 Blood Cancer UK Trustees will automatically be excluded from acting as peer reviewers and from membership of any funding committee. If a committee member is appointed to the Trustee Board, they must immediately resign their committee membership.
- 4.4 It is the individual's responsibility to adhere to the spirit of this policy 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 Blood Cancer UK. This includes interests held by the individual's immediate family.
- 4.5 The Secretariat will aim to identify any conflicts of interest. However, for all individuals covered by the policy as defined in clause 2.1, it is ultimately the individual's responsibility to declare potential conflicts of interests by disclosing these to the Secretariat at the earliest possible opportunity. Blood Cancer UK staff should report details of any potential conflict of interest to their line manager.
- 4.6 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 Blood Cancer UK.
- 4.7 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 Research Funding Lead, the Deputy Director of Research, or the committee chair, as appropriate.
- 4.8 Those individuals 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 and the communities we support. These principles are expected to be applied with consistency and in a way that encourages others to apply these principles.

- 4.9 For the sake of transparency, conflicts of interests in funding or monitoring committee meetings will be recorded in the minutes of the meeting.

5. Application of principles

- 5.1 Details of application forms and related documentation, meeting papers and associated correspondence, and the names of external reviewers are strictly confidential and should not be discussed with any persons outside the review process. Breach of this confidentiality would result in the individual in breach being barred from further review or monitoring roles and if the individual is a serving committee member they would be asked to step down from the committee.
- 5.2 Discussions of a proposal between members of a funding committee which occurs outside a committee meeting should be declared to the chair of the committee.
- 5.3 If a committee member, patient representative or Trustee is approached by an applicant for advice on an application, they 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.
- 5.4 If a peer or patient reviewer is approached by an applicant for advice on an application, they must report this to the committee chair and Secretariat. If they provide advice this will result in their review being withdrawn.
- 5.5 Blood Cancer UK's approach to conflicts of interest ensures that individuals with direct connections to an application or the applicants are excluded from decision-making, while those with indirect connections participate with restrictions, preserving fairness and impartiality in funding decisions. We use the criteria noted in the clause below to clarify the approach and maintain transparency in our processes.

Conflicts of interest confirmed from those on Lists A and/or B as detailed in clause 5.6 will result in the conflicted person being excluded from providing written peer or PVGAN reviews, or from the relevant part of any meeting

including funding committee meetings where matters concerning the grant application are discussed. They 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 the grant application or review on which they are conflicted and, should they receive them in error, must immediately destroy them and notify the Secretariat.

- 5.6 In post award monitoring meetings, conflicts of interest confirmed from those on List A will result in the conflicted person being asked not to participate in the relevant part of any meeting where matters concerning the project are discussed. Conflicts of interest confirmed from those on List B will be noted as a 'limiting restriction' and individuals may be permitted to participate in, but not lead, the discussions around the project. Potential conflicts of interest from those on List C will be assessed by the Secretariat.

List A: Individuals will be excluded from participating in written application review, funding decision discussions or post award monitoring discussions for an individual application/project if they:

- are directly involved in the application as a lead applicant, co-applicant or 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.
- 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.
- If a committee member is a lead applicant or joint lead applicant on an application, that individual will also be excluded from participating in written application review or funding decision discussions for all applications to that round, 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 committee members application relates.

List B: Individuals will be excluded from participating in written application review or funding decision discussion and noted as having a limiting restriction for post award monitoring discussions for an individual application/project if they:

- 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, trial or joint grant application, or have jointly published original research papers);
- are personally connected to any of the applicants or co-investigators, as immediate family;
- are personally connected to any of the applicants or co-investigators as a supervisor or student or have been connected in this way during the last three years;
- are a business partner of any of the applicants or co-investigators, or have a direct or indirect financial interest in the grant application;
- 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.

List C: The suitability of individuals to take part in application review, funding decisions or post award monitoring discussions will be assessed if any other potential conflicts of interest are declared to Blood Cancer UK for consideration including, but not limited to, situations where the individual:

- has provided technical or general advice to the applicant(s) or co-investigators but will not be involved in study;
- has 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, individuals may be noted as conflicted, as having a limiting restriction or as non-conflicted and this 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.

- 5.7. 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. A deputy chair should be appointed to the meeting if not already in post.
- 5.8. 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.
- 5.9. The fact that a conflict of interest was identified, and how it was managed, must also be recorded in the minutes or report of each committee meeting.
- 5.10. 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.

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 Blood Cancer UK. If a major conflict of interest arises that does compromise an individual's ability to continue in their position within or assisting the charity, the matter will be discussed by Blood Cancer UK's senior leadership group.

6. Personnel responsible

The Executive is responsible for approving this policy. It should be reviewed not less than once every two years. All Funding Committee members will be required to agree to and adopt the policy on appointment and on each occasion where they are asked to participate in research funding or monitoring decisions.

7. Monitoring and enforcement

A register of conflicts of interests will be kept up to date by Blood Cancer UK. This includes all individuals appointed as members of a funding or monitoring committee, members of the Secretariat and Trustees of Blood Cancer UK.

8. Review and revision

This policy will be reviewed as needed and not less than once every two years.

9. Appendices

Applicant Roles

Applications submitted to Blood Cancer UK for funding would include the following role options:

Lead Applicant (also known as the Main Applicant or Principal Investigator) has overall responsibility for the delivery and reporting of the grant and ensuring that the terms and conditions of the award are met.

Co-applicant is an investigator who contributes equal time and intellectual input to the project as the Lead Applicant and has equal status on the grant.

Co-investigator is an investigator who provides significant intellectual input, as well as overseeing some aspects of the experimental work.

Collaborator is an investigator who may provide reagents, advice or access to research materials, but won't be directly involved in the day-to-day work. A letter of support from the collaborator is included in the funding application.

10. Version History

Policy author	Director of Research, Policy and Services
Approved by	Executive Team
Date of last review	November 2024