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**Grants Committee Conflict of Interest & Confidentiality Policy**

**1. General**

a. This policy relates to Bowel Research UK Grants Committee, its Chair and other members and the Peer Reviewers.

b. The term "conflict of interest" is defined as any research, financial (e.g. compensation in addition to regular salary support), other appointment or any other interest that conflicts with the service of an individual because it could significantly impair the individual's objectivity or could create an unfair competitive advantage for any person or organisation.

b. The purpose of this document is to ensure that conflicts of interest are properly managed 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 Grants Committee members might interfere with their ability to work towards the furtherance of the charity’s objectives.

c. This policy is based on the standard conflict of interest policy of the Association of Medical Research Charities (AMRC) of which the charity is a member.

**2. Declaration of interests**

a. Any individual covered by this policy, as defined in paragraph 1a, must declare any disclosable external interest on their appointment to the charity. They must also declare any further interest preferably before but certainly at the beginning of every Grants Committee meeting or discussion item. A Declaration of Interests form must be updated by the Chair of the Grants Committee once a year and this register will be kept by the charity. The Director of Research & PPI will be responsible for this process.

b. Interests which should be disclosed by such individuals include:

* Participant in a research project that is being considered by the charity
* Consultancies and other external appointments (paid and unpaid), together with details of any remuneration or other benefits arising from the projects being considered.

c. Grants Committee members 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 the charity. This includes interests held by or appointments of the member’s partner or children.

**3. Discussion of proposals**

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

b. Discussions of a proposal between members of the Committee, which occurs outside a meeting of the Grants Committee, should be declared to the Chair.

c. If a Grants Committee member is approached by an applicant for technical advice on an application, they may provide advice, but must inform the Grants Committee Chair and the Director of Research and PPI. They may subsequently be asked by the Chair to absent themselves from a discussion of the application concerned.

d. Any applicant who requests advice on the process or seeks information on the status of their proposal should be referred to the Director of Research and PPI.

**4. Managing conflicts of interests**

a. It is not possible to prescribe a comprehensive set of rules on interests. Individuals are best placed to know their duties with other bodies and where these might conflict. If in doubt, individuals should discuss in the first instance their concerns with the Chair or the Chief Executive and Director of Research and PPI.

b. Before each meeting or when asked to review an application, members of the Grants Committee are expected to declare any potential conflicts of interest relating to individual projects to the Director of Research & PPI and the Chief Executive or during the meeting as soon as the existence of a conflict becomes apparent.

c. Where a Grants Committee member is an applicant or co-applicant on a grant application, they must declare an interest and withdraw from any consideration of that application. They must retire from the meeting when the application is assessed.

d. Grants Committee members who could be seen as a direct competitor of the applicant (e.g. they are funded or applying for funding for a similar project to the proposal under discussion) should declare an interest and may be asked to withdraw from the meeting for that application, or may be allowed to stay, but not vote on the application.

e. In cases where an individual is uncertain as to whether a conflict of interest exists or not, they should report this to the Chair and Director of Research & PPI who will discuss the matter with the individual as necessary and will make a decision with regard to the provisions of paragraphs 4 c) and 4 d) above.

f. If an individual is concerned about a possible conflict of interest involving another member of the Board/Committee, then they should raise the matter with the Chair and Director of Research & PPI who will discuss the matter with the individual as necessary and will make a decision with regard to the provisions of paragraphs 4 c) and 4 d) above.

g. Where the Chair of the Committee is applying for funding they should absent themselves from that item and not appoint any written reviewers. This should be the case whenever funding is directly attributed to the Chair regardless of the type of applicant they are listed as (e.g. lead or joint lead applicant, co-investigator, collaborator etc.). In this situation, another member of the Committee will be appointed by the Committee to take over the Chair’s responsibilities for that item.

**5. Resolution of conflicts of interest**

a. The charity 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.

b. In a small number of cases, major conflicts of interest may arise that compromise an individual’s ability to continue in their position within the charity. Where such a situation relates to a Grants Committee member, the matter will be discussed by the Chair of the Committee together with the Director of Research & PPI and the Chief Executive or an alternative member of the Committee if the case concerns the Chair. In cases where agreement cannot be reached through this means, the case will be referred to the Grants Committee as a whole, whose decision should be taken as final. The Co-Chairs of the charity must be kept abreast of such issues.

c. The minutes of the meeting will record all decisions regarding conflicts of interests and any withdrawals for particular items. It is the responsibility of the Chair to ensure that this procedure is adhered to.

**6. Confidentiality**

a. Meeting papers and related correspondence are strictly confidential and must not be discussed or distributed to persons outside the review process.

b. Comments provided by members must not be disclosed to any person except as is required for the review process.

c. Anonymised panel comments will be provided to applicants as required.

d. The Chief Executive will inform applicants of funding decisions unless otherwise agreed.

**7. Peer review**

All matters regarding confidentiality and conflict of interest apply equally to Peer Reviewers. However, they will not be sent the full policy. Instead, in the letter requesting the review, it should clearly be stated that full confidentiality is expected and that any conflict of interest should be declared. Wording of this letter should be agreed by the Chair and Director of Research & PPI.

**8. Updating the policy**

a. The Trustees of Bowel Research UK will review this policy every two years.

 Agreed by C Knowles, A Senapati, P Reynolds & R Porta on 26 January 2021