

Conflicts of Interest Policy

1. Introduction

- 1.1. This policy sets out principles for minimising and managing potential conflicts of interest for those involved in Medical Research Foundation (the charity) business including strategy, research assessment, funding and contract decisions, investment management, policy, recruitment, pay & reward, and other decisions. This policy is in furtherance of the provisions of the charity's governing document¹, which sets out how conflicts of interests are to be managed.
- 1.2. A conflict of interest is any situation in which an individual's personal interests or loyalties could, or could be seen to, prevent the individual from making a decision in the best interests of the charity. In setting out its policy on declarations of interest, the charity aims to achieve effective management of conflicts of interest without over-prescriptive regulation.
- 1.3. Like others who serve the public, individuals working for/with the charity are expected to follow the [Seven Principles of Public Life](#) as set out by the Committee on Standards in Public Life (The Nolan Committee). They should understand fully their terms of appointment, duties and responsibilities, through induction and/or via guidance notes.

2. Objectives of the policy

- 2.1. Trustees are under a legal duty to act only in the best interests of the charity. The Board of Trustees extends this expectation to any individual it appoints, or employs, to discharge its responsibilities.
- 2.2. The policy looks to safeguard best practice by:
 - Ensuring that those individuals covered by the policy make decisions free from bias.
 - Guarding against conflicts of interest that may arise as a result of the positions held by individuals.
 - Protecting the charity and those individuals covered by the policy against impropriety, or the appearance of impropriety, including reputational risk.

3. Scope of the policy

- 3.1. This policy applies to, and must be followed by, any individual who is in a decision-making or influential role including non-employees (namely trustees, independent committee and panel chairs and members, peer reviewers) and employees (Chief Executive and Director levels).

4. Declaring interests

- 4.1. Declaring conflicts of interests is primarily the responsibility of the affected individual and the charity expects individuals to be able to identify any potential conflicts of interest at an early stage.
- 4.2. Individuals must always declare potential conflicts of interest which affect them.
- 4.3. Upon appointment to the charity's Board, committee or panel (including research review panels composed of researchers, people with lived experience, or a combination), or upon employment,

¹ Article 9 of the Medical Research Foundation's Articles of Association.

individuals will be asked to read and comply with this policy. The charity's Board, committee members, review panel members, and senior employees will also be asked to complete a Declaration of Interests Form.

- 4.4. Individuals will need to review their Declarations of Interest Form annually and confirm it remains accurate. However, any changes to circumstances, or new interests arising, during the tenure of appointment or employment should be declared to the Governance Team or, if it pertains to research funding, the Research Team as soon as practicably possible. Individuals will be asked to update and sign their Declaration of Interests Form at this point.
- 4.5. Declarations may also need to be made during meetings (see Sections 6 and 7 below) and will be recorded in the meeting minutes.
- 4.6. Individuals who are invited to participate in decision-making on an ad-hoc basis such as (non-senior) employees involved in recruitment or procurement decisions are not required to complete a Declaration of Interests form. However, they must disclose any actual or potential conflicts of interest to others involved in the decision-making and the interest must be documented. Procurement decisions must be made in line with the Procurement Policy.
- 4.7. A summary of who is required to declare interests, when, and how is provided in Annex 1.

5. Interests to be declared

- 5.1. Individuals (defined under paragraph 3.1) are required to declare any private, professional, commercial, academic or other interests that may potentially conflict with the charity's interests, or which might be seen by reasonable members of the public, or the Charity Commission, to influence or bias judgment when discussing or reaching decisions.
- 5.2. Only current interests need be declared but it is possible that, on occasion, a past interest will or could influence present behaviour in which case such an interest must also be declared.
- 5.3. It is impossible to prescribe a comprehensive set of rules on interests. Individuals are best placed to know their duties as a trustee, committee or panel member, senior employee or peer reviewer, and where these might conflict. If in doubt, individuals should discuss issues in advance of the relevant meeting with the chair of the body of which they are a member, the Governance Team or in the case of peer reviewers and research review panel chairs and members, the Research Team.
- 5.4. Only those outside associations that relate to the activities of the charity (i.e. medical, bio-medical, pharmaceutical, healthcare provision and similar activities) or from whom the charity may procure services, and which members of the public might reasonably think could influence or bias individual's judgment when assessing, discussing and/or reaching decisions on charity business.
- 5.5. In the context of charity business, conflicts of interest may arise where an individual has a personal or family interest within the following:
 - Close links with, or an interest in, another charity or organisation working within the health research arena (e.g. trusteeship, employment, consultancy, non-executive directorships, committee/panel appointments),
 - Close links with, or an interest in, a particular institution from which a grant or other funding application is being considered (e.g. employment or academic collaborations).
 - Close links with or an interest in an organisation the charity may enter into a joint-funding partnership with (i.e. including trusteeship, employment, consultancy, non-executive directorships, committee/panel appointments).
 - A commercial or pecuniary interest in an organisation or issue which comes before a board, committee or panel where a member or an organisation with which an individual is involved may

benefit financially, directly or indirectly, from a decision made.

- A commercial or pecuniary interest in an organisation which the charity has entered into, or who is looking to enter into, a contract for the provision of goods or services.
- A non-pecuniary interest where an individual has other interests that might be thought to influence them, either wittingly or unwittingly in the matter under discussion.

Connected persons

- 5.6. Individuals should be aware that conflicts of interest can arise not only through themselves but also when the interests of those connected to them are incompatible or in competition with the interests of the charity. 'Connected persons' are defined under the Charities Act as:
- a) a child, parent, grandchild, grandparent, brother or sister of the individual.
 - b) the spouse or civil partner of the individual or of any person falling under paragraph a).
 - c) a person carrying on business in partnership with the individual or with any person falling within paragraph a) or b).
- 5.7. Individuals should declare any known interest of persons connected to them; they do not have to make any special request for this information from them but they must declare the interest once they become aware of it. In declaring an interest of a Connected person, individuals do not need to identify (i.e. name) that person.
- 5.8. Further guidance on declaring interests outlined above are available with the Declaration of Interests forms.

6. Managing conflicts of interest

- 6.1. Potential conflicts of interest at meetings of the charity's Board, committees and panels will be identified by the Executive ahead of the meeting who will take necessary steps to manage potential conflicts. Trustees, committee members and panel members are also required to declare any interests at meetings themselves, if not already identified by the Executive.
- 6.2. For the purposes of peer review, and for research review panel members and chairs, the responsibility for identifying potential conflicts of interest is delegated to the Research Team.
- 6.3. Conflicts of interest will normally be resolved through the individual concerned not participating in the relevant discussions and in any subsequent discussion and, in some cases, restricted access to information. In exceptional circumstances, a board or committee may vote – in the individual's absence – to permit them to participate in the discussion but not the decision.
- 6.4. The chair will advise on action to be taken to resolve any conflict of interest which becomes apparent at a meeting. Depending on the nature and degree of interest, the chair will decide whether the individual should leave the room for a particular item or remain but take no part in the discussion.
- 6.5. Trustees, committee and panel members are required to be vigilant in raising any conflicts as soon as they become aware of them so that appropriate action can be taken to manage this. If there is any doubt, members should consult with the chair or the Executive for advice.
- 6.6. Any identified conflict of interest and actions taken to manage the conflict will be recorded in the minutes of the meeting.
- 6.7. An individual who is concerned about another individual's potential or actual conflicts of interest should raise the issues with the chair or Executive (in private, if possible). This includes issues concerning charity staff and external advisers.
- 6.8. All individuals are expected to adopt safeguards to prevent conflicts arising from accepting other

appointments/consultancies/membership of organisations etc. during their tenure of appointment or employment. If in doubt, members should consult the chair or the Executive.

7. Additional provisions for specialist areas

- 7.1. For certain roles within the charity, additional requirements, or variations to the standard interest declaration and management process, apply.

Research Review Panels

- 7.2. With the exception of the Emerging Leaders Prize Panel and the Changing Policy and Practice Panel, the charity's research review panels are typically convened specifically for each research funding call.
- 7.3. Where a research review panel member is a co-investigator or named collaborator on a grant application, or a co-trustee in the case of one of the charity's trustees being the applicant, they must declare an interest and withdraw from the panel.
- 7.4. Research review panel members who could be seen as a direct competitor of the applicant (e.g. they are funded or are applying for funding on a similar project to the proposal under discussion) or have collaborated or published with the proposal applicant or co-investigator within the past three years, or have been employed by the same institution within the last twelve months, should declare an interest ('hard conflict') and will be asked to withdraw from the meeting for that application. That member will not receive documents pertaining to the application, learn the identity of the peer reviewers or receive peer reviewers' reports. They must retire from the meeting when the application is assessed. Where a conflict of interest is identified for the chair of the research review panel, the deputy chair will lead the discussion for that item.
- 7.5. If an identified association between a research review panel member and an applicant or co-investigator is deemed by the Research Team to be minimal or unlikely to induce bias in the assessment process ('soft conflict'), panel members may be allowed to stay in the meeting or stay in the meeting but not vote on the application, at the research review panel chair's discretion. Any concerns or uncertainties regarding the appropriateness of the research review panel member's involvement will be escalated to the Director of Research for further consideration and decision.
- 7.6. If a research review panel member is approached by an applicant for technical advice on an application, they may provide advice but must report this to the panel chair and Executive. They may subsequently be asked by the research review panel chair to absent themselves from a discussion of the application.
- 7.7. If a research review panel chair is approached by an applicant for technical advice on an application, they may provide advice but must report this to charity staff. They may subsequently be asked by the research review panel secretariat to absent themselves from the discussion of the application, and the deputy research review panel chair will lead the discussion instead.

Peer reviewers

- 7.8. Peer reviewers are invited to provide independent assessments on grant applications ahead of research review panel review. Peer reviewers must not be co-investigators or named collaborators on a grant application. Peer reviewers will not be invited to assess an application if they are a direct competitor of the applicant, have collaborated or published with the proposal applicant or co-investigator within the past three years, or have been employed by the same institution within the last twelve months. Peer reviewers must identify and declare any potential conflicts of interest as soon as they are invited to review an application. If a conflict exists, they must decline the invitation to review.
- 7.9. If a peer reviewer declares a conflict of interest, and this is confirmed by the Research Team as a valid 'hard' conflict, the Research Team is responsible for ensuring that the conflicted peer reviewer is not

involved in any aspect of the review process for that application. This includes providing any application materials to the reviewer and confirming that they will not proceed with the review under any circumstances.

Other panel, board or committee members

- 7.10. There may be additional interests or measures to consider for specific decision-making bodies, for example the Investment Committee, and these will be detailed in the Terms of Reference for that body.

8. Declarations of Interest Register

- 8.1. The charity will maintain a Declarations of Interest Register for the purposes of managing conflicts of interest, and for transparency, which will reflect the interests declared by trustees, committee members and senior employees. It is open to inspection by relevant stakeholders including regulatory bodies and auditors.
- 8.2. The Register will be updated to reflect the interests declared through the annual completion of the Declarations of Interest forms, and any updates or changes to these received through the year.
- 8.3. For audit purposes, each iteration of the published Register will be maintained by the Governance Team (and the dates on which it applied) and retained in line with the charity's Records Management Policy.
- 8.4. The Research Team will maintain Declarations of Interest Registers for the relevant research review panels composed of researchers, people with lived experience, or a combination thereof. These panel-specific registers will be incorporated into the central Declarations of Interest Register managed by the Governance Team to ensure consistency and oversight.
- 8.5. Peer reviewers are not required to complete a Declarations of Interest Form. Their potential conflicts of interest will be managed through other mechanisms outlined in this policy.

9. Review

- 9.1. This policy will be reviewed triennially or as business reasons dictate.

10. Associated relevant legislation and external guidance

- Companies Act 2006
- Charities Act 2011
- Charity Commission Guidance: CC29 Conflicts of Interest Guidance

Annex 1: Summary of Declaration of Interest Requirements

Who	When to Declare	How to Declare	Additional Notes
Board members, committee/panel members (including research review panels composed of researchers, people with lived experience, and other contributors), employees	Upon appointment	Read and comply with the policy; complete a Declaration of Interests Form	Must review and confirm annually; update Declaration of Interests form if circumstances change
Peer reviewers	Upon selection	Read and comply with the policy	Declare any new interests to the Research Team as soon as practically possible
All individuals during at Board/committee/panel/ meetings (including research review panels composed of researchers, people with lived experience, and other contributors),	During meetings (if relevant)	Verbally declare interest during the meeting	See Sections 6 and 7 of the policy for meeting specific guidance. Verbal declarations are noted in the meeting minutes.
Senior Employees	At any time a potential conflict arises	Declare to the Governance Team, or chair of the panel making the decision.	Update and sign Declaration of Interests Form when changes occur.
All other individuals who will be involved in decision making not covered by the above (e.g. non-senior) employees involved in recruitment or procurement decisions)	At any time a potential conflict arises	Declare to the Governance Team or chair of the decision-making process prior to the decision being made.	Verbal declarations are noted in the relevant documentation.

Annex 2: Key Information for Research Review Panel Members

This annex summarises key points from the Medical Research Foundation's Conflicts of Interest Policy relevant to research review panel members, including researchers and people with lived experience. It outlines your responsibilities for declaring and managing conflicts of interest during your involvement in research assessment and funding decisions.

Please note that this summary is not a substitute for the full policy. For comprehensive guidance and context, you should refer to the complete Conflicts of Interest Policy.

1. Applicability

Applies to all research review panel members, including trustees, independent review panel members and chairs.

Most panels are convened specifically for each funding call (except the Emerging Leaders Prize Panel and the Changing Policy and Practice Panel).

2. What is a Conflict of Interest?

A conflict of interest is any situation where your personal interests or loyalties could, or could be seen to, compromise your ability to act solely in the best interests of the charity.

This includes:

- Personal, professional, or financial interests.
- Interests of close family members (e.g. spouse or children).
- Past or current collaborations or institutional affiliations

3. Your Responsibilities

Declaring Interests

You must declare any potential conflicts of interest as early as possible, ideally before the research review panel meeting or as soon as they arise.

On appointment, you must:

- Read and comply with the full Conflicts of Interest Policy.
- Complete a Declaration of Interests Form.

For standing panels:

- Review and confirm your declaration annually.
- Notify the Research Team of any changes during your term.

During Meetings

You may be asked to declare interests during meetings if not already disclosed.

If you're unsure whether a connection creates a potential conflict, consult the Research Team or research review panel chair.

4. Managing Conflicts

You **must declare and withdraw** from the panel if:

- You are a co-investigator or named collaborator on an application.
- You are a Trustee, and the applicant is also a Trustee.

You **must** declare **and may be asked to withdraw** from the review panel if:

- You are a direct competitor of the applicant/co-applicant/s (e.g. working on a similar project).
- You have collaborated or published with the applicant/co-applicant/s in the past three years.
- You have worked at the same research organisation in the past 12 months.

In such cases:

- You will not receive application documents or peer review reports.
- You must leave the room during the discussion of the application.

If the review **panel chair** has a conflict, the **deputy chair** will lead the discussion.

5. Special Situations

If you are approached by an applicant for technical advice:

- You may provide advice.
- You must report this to the review panel chair and the Research team.
- You may be asked to withdraw from the discussion of that application.

If a conflict is considered minimal:

- You may be allowed to stay in the meeting or observe but not vote, at the Chair's discretion.

6. Support and Queries

If you are uncertain about a potential conflict, contact the Research Team. They will consult with the review panel chair to determine the appropriate action.

Annex 3: Key information for Peer Reviewers

This annex outlines key principles from the Medical Research Foundation's Conflicts of Interest Policy relevant to peer reviewers. It supports transparency and integrity in the charity's research assessment processes.

Please note that this summary is not a substitute for the full policy. For comprehensive guidance and context, you should refer to the complete Conflicts of Interest Policy

1. Applicability

This guidance applies to all individuals invited to act as peer reviewers for the charity's funding calls.

2. What is a Conflict of Interest?

A conflict of interest is any situation where a reviewer's personal, professional, or financial interests could, or could be seen to, compromise their ability to provide an impartial assessment.

This includes:

- Personal, professional, or financial interests.
- Interests of close family members (e.g. spouse or children).
- Past or current collaborations or institutional affiliations

3. Your Responsibilities

Peer reviewers must:

- Identify and declare any potential conflicts of interest as soon as they are invited to review an application.
- Decline the invitation to review if a conflict of interest exists.

4. Situations Requiring Declaring or Declining

You **must not review** an application if:

- You are a co-investigator or named collaborator on the application.
- You are a direct competitor of the applicant/co-applicant/s (e.g. working on a similar project).
- You have collaborated or published with the applicant or co-applicant/s within the past three years.
- You are employed by the same Research Organisation as the applicant or co-applicant/s .

5. Managing Conflicts

If a conflict is identified:

- You will not be sent the application materials.
- You will not be involved in any aspect of the review process for that application.

6. Support and Queries

If you are unsure whether a conflict exists, contact the Research Team for guidance. The team will assess the situation and advise on next steps.