

CONFLICT OF INTEREST POLICY

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DOCUMENT HISTORY

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This policy shall be reviewed every 12 months from the date of the current approved version.

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Scope

This policy sets out Pankind's position on conflicts of interest for all persons involved in the research grant program at the organisation, including:

- Scientific Advisory Panel (SAP) members
- External referees
- Applicants
- Staff
- Trustees
- Volunteers
- Contractors

The purpose of this policy is to facilitate the disclosure of interests and the identification and management of conflicts of interest. We are committed to fair review of all grant applications ensuring any conflicts arising are dealt with consistently, transparently, and with rigour. These policies are necessary in order to:

- ensure consistency and credibility of the research grant assessment process
- maintain the integrity and reliability of the conduct and outcomes of the research funded at Pankind
- mitigate the risks associated with the complex relationships between researchers and private organisations
- preserve public trust in Pankind as an organisation funding medical research.

This policy supports the [Australian Code for the Responsible Conduct of Research](#), which articulates the broad principles that underpin the responsible conduct of research.

1. Definition of Conflict Of Interest

As defined by the National Health and Medical Research Council (NHMRC) Act 1992, a conflict of interest means *any direct or indirect pecuniary or non-pecuniary interest*. A conflict of interest exists in a situation where an independent observer might reasonably conclude that the professional actions of a person are or may be unduly influenced by other interests. The perception of a conflict of interest is an important issue, as it can raise concern on both the integrity of individuals and the organisation's management practices.

Engaging in research and the management of grant funding necessitates seeking expert opinions or advice. In Australia, the pool of specialists in certain fields may be so limited that most potential advisors may potentially be connected to the research, whether through its design, funding, collaboration, or involvement in related projects. It should be recognised however, that having multiple interests does not necessarily constitute a conflict of interest.

Broadly, financial interests requiring disclosure include, but are not limited to:

- direct payments to the researcher, such as salary, consultancy payments, speaking fees,
- indirect payments to the researcher, for example funding of travel, accommodation
- payments to support research, such as funding from an industry or interest group
- company shares, options or royalties
- directorships

Non-financial interests that require disclosure include, but are not limited to:

- board membership or other affiliation with an organisation that could stand to benefit from or be affected by the research
- personal or social relationships and current and past professional relationships, where relevant
- recent employment with, or role in, organisations with financial links or affiliations with industry groups that could stand to benefit from or be affected by the research.

2. Confidentiality

- a) All research applications and related correspondence, meeting documents and minutes, and the identity of external or reviewers or referees are strictly confidential.
- b) SAP members and external reviewers comments are confidential and are not disseminated or to be discussed outside the grant review process.
- c) SAP members, staff and external reviewers should not discuss grant assessment information or feedback with applicants.

3. What constitutes a Conflict of Interest at Pankind?

An individual will be deemed to have a conflict of interest if they:

- a. Are the Principal Investigator or Co-investigator on the grant application, even if they are a minor collaborator or someone who has provided a letter of support;

- b. Are based at the same institution as the Principal Investigator, or have been in the previous 12 months (even if they don't know the individual personally);
- c. Being at the same institution as a Co-Investigator is not *automatically* treated as a conflict, but should still be disclosed and may need to be treated as a conflict on a case-by-case basis.
- d. Have substantively collaborated with the Principal Investigator or Co-Investigators in the previous 3 years, in the sense of providing intellectual input into a project;
- e. Are a relative of the Principal Investigator or Co-Investigator/s
- f. Are a business partner of the Principal Investigator or Co-Investigator/s or have a financial interest in the grant application;
- g. Are in a supervisory relationship with the or Principal Investigator or Co-Investigator/s or (now or in the previous 5 years);
- h. Have any other relationship which could compromise, or cause a reasonably-informed outsider to doubt, the objectivity of the evaluation of the grant application.

4. Identification of Conflicts of Interest

- a. The SAP will be required to provide written disclosure of any potential conflicts of interest at the time of joining under the Scientific Advisory Panel Terms of Reference.
- b. Before allocating grant assessments and distributing application documents, the head of programs will take reasonable steps to identify any grant applications or other matters in respect of which a reviewer has a potential conflict of interest, based on the information available about that reviewer.
- c. All reviewers are responsible for ensuring that they do not participate in the evaluation of any grant application or other matter in relation to which they have a conflict of interest. If a member becomes aware of any other matter that would reasonably be expected to give rise to, or be viewed as, a conflict of interest (as defined in this policy) then he or she must declare the matter to the head of programs as soon as the potential conflict becomes apparent.
- d. The head of programs or program delegate must bring to the Chair's attention all relevant information concerning potential conflicts of interest at any time.

5. Management of Conflicts of Interest

- a. In accordance with Section 4, all conflicts of interest should be disclosed in writing prior to any grant activity as soon as a conflict arises.
- b. Where a conflict of interest in relation to a grant application has been disclosed, the individual:
 - i. May not receive any documents relating to that grant application and, should they receive documents inadvertently, must immediately destroy them and notify the head of programs;
 - ii. Must absent themselves from the relevant part of any meeting where matters concerning that grant application are discussed, either via physically leaving the room or removing themselves from online discussions;
 - iii. May not take part in any decision in relation to that grant application.
- c. Conflicts are documented and recorded through meeting minutes as applicable.
- d. The head of programs will consult as necessary with the SAP Chair, or the deputy chair if the Chair is conflicted.

Each individual falling under the scope of this policy must review a copy of this policy and acknowledge in writing that they have done so.