**Conflicts of Interest Policy**

This policy relates to all Circulation Foundation (CF) Research Panel and other funding panels of the Charity, their chairs and other members.

The purpose of this document is to minimise the potential for conflicts of interest arising 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 panel members might interfere with their ability to work towards the furtherance of the Charity’s objectives.

**Declaration of interests**

Members must declare any personal or business interest which may, or may be perceived to, influence their judgement. New interests should be declared as they arise and a register of interests will be kept up to date by the Charity. Interests which should be disclosed include:

• Equity interests (if worth £10,000 or more, or more than 1% of the total issued capital) in enterprises with involvement in pharmaceuticals, healthcare, biotech or related areas, or in any other enterprise that may have a real or perceived interest in the work of the charity. Third party investments (e.g. ISAs) should be held exempt from this.

• Consultancies and other external appointments (paid and unpaid), together with details of any remuneration or other benefits arising from these.

 Members should adhere, as far as is possible, to the spirit of this document and in so doing should 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.

**Review process**

1. The Awards Panels have a duty to ensure that grant assessment and development of the CF Research Aims are carried out as impartially and objectively as possible.
2. Funding decisions should only be reached after external peer review of the highest international standard and engagement of any additional expertise deemed necessary.
3. Details of applications, meeting papers and related correspondence, and the names of external reviewers are strictly confidential and should not be discussed with persons outside the review process.
4. Members can expect that their comments will be treated in confidence by CF staff and Trustees.
5. Members undertake to keep all documents secure and dispose of them securely after decisions have been reached.
6. Discussions of an application between panel members which occur outside a panel meeting should be declared to the Panel Chairman.
7. Panel members should not discuss panel deliberations or the application process directly with applicants, unless specifically requested by the Charity. If a panel member is approached by an applicant on administrative grounds or to seek information on the status of their application, they should refer the applicant to the relevant member of the Charity’s staff.
8. All members of the Research Panel cannot be involved in the marking or interviewing of applications they are part of.

**Conflicts of Interest**

Members of funding panels are expected to declare any potential conflicts of interest at the beginning of meetings. The Research Panel should satisfy itself that all conflicts of interest have been declared and, when required, individuals may be asked to leave the room and take no part in the discussions of the application. If necessary, the Research Panel may wish to debate and decide who should or should not take part in the discussion, and the ultimate decision will be made by the Panel Chairman.

Automatic exclusion from participation in a funding decision

An individual should be automatically excluded from participation in a funding decision in cases where that individual has a direct interest in the funding proposal under discussion. A direct interest applies to any of the following situations:

• The individual concerned is the Principal Applicant, Co-applicant, Supervisor or Collaborator on the funding proposal. In this case, the individual will not receive names of reviewers, reviewer reports or scores relating to the application.

• A relative (including, but not limited to, spouse (current or past), siblings, children and parents) of the individual is the Principal Applicant or Co-applicant.

• An applicant on the proposal is a business partner of the individual.

• An applicant on the proposal is a member or employee of the same institution as the individual concerned.

Exclusion at the Charity’s discretion

In certain situations, an individual may be excluded from discussion of a proposal at the discretion of the Charity. Examples of such situations include:

• The individual concerned can be seen as a direct competitor of the applicant; i.e. they are currently being funded or are currently applying for funding on a project of a similar nature to the proposal under discussion.

• The individual has acted as an external reviewer, or on a funding panel/committee in respect of the proposal under discussion, at a time when the proposal was being discussed by another funding body.

• The individual has collaborated or published with the applicant within the past three years.

• The individual is aware of any other issue that might reasonably be expected to give rise to, or give rise to the perception of, a conflict of interest.

b) In cases where an individual is uncertain as to whether a conflict of interest exists or not, they should report this to the Charity. The Charity shall discuss the matter with the individual as necessary and report to the Panel Chairman, who will make a decision.

c) If an individual is concerned about a possible conflict of interest involving another member of a

Research Panel, then he or she should raise the matter with the Panel Chairman.

d) If the Circulation Foundation has reason to believe that a panel member has breached the Conflicts of Interest Policy, they may be asked to resign in order to ensure the impartiality of the review process.

Declaration:

I have disclosed any conflicts of interest and I confirm that I have read the above policy and agree to the conditions.

Signed: Dated: