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Conflicts of interest:
research funding

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| * This policy relates to all advisors and committees of the charity, their chairs and other members, including trustees of the charity, who are involved in any aspect of Sands’ funding process.
* The purpose of this document is to minimise the risk that a conflict of interest will arise. In so doing, it will protect the charity and those who work for it from any perception, real or otherwise, that the external interests and affiliations of its committee members might interfere with their ability to work towards the furtherance of the charity’s objectives to reduce the number of babies stillborn or dying neonatally and improve bereavement care.
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# Declaration of interests

* 1. Any persons covered by this policy, as defined above, must declare any disclosable external interest on their appointment, and annually thereafter. A register of interests will be kept up to date by the charity.
	2. Interests which should be disclosed by such individuals include:
		1. 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.
		2. Consultancies and other external appointments (paid and unpaid), together with details of any remuneration or other benefits arising from these.
		3. Those involved in the decision-making process (including trustees) 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 the spouse or children.
	3. Trustees are required to complete a conflict of interest declaration annually, in which they must declare any interests which may potentially cause a conflict in the course of fulfilling their duties and responsibilities as a Trustee. Trustees with a conflict of interest shall absent themselves from the room for discussions where the conflict exists. In cases where the potential for conflict is uncertain, the Chair of Trustees shall judge whether the individual should be excluded from the discussions.
		1. Details of discussion of that application are expurgated from any papers the member receives.

# The Sands Perinatal Expert Panel

* 1. The Sands Perinatal Expert Panel (PEP) is an external group that meets once a year.
	2. The PEP’s purpose is to advise Sands on its research funding strategy and funding allocation. The PEP’s terms of reference are described in a separate document.

# Discussion of proposals by Sands Research Subcommittee and Board

* 1. Sands Research Subcommittee, comprising trustees and Sands staff, consider funding applications in the light of recommendations from the PEP and the priorities outlined in the Sands Research Strategy. The Subcommittee makes a recommendation for funding to the Board, which approves or rejects the recommendation.
	2. Details of applications, meeting papers and related correspondence are strictly confidential and should not be discussed with persons outside the Subcommittee and Board.
	3. A staff member or trustee with a conflict of interest shall absent themselves from the room for discussions where the conflict exists. In cases where the potential for conflict is uncertain, the Chair shall judge whether the individual should be excluded from the discussions.
		1. Where a conflict of interest exists, details of discussion of that application are expurgated from any papers the member receives.
	4. Discussions of a proposal between members of the Research Subcommittee or Board of Trustees which occur outside a committee meeting should be declared to the Chair of the Subcommittee or Board.
	5. If a PEP, Subcommittee or Board member (including serving Trustees) is approached by an applicant for technical advice on an application, he or she may provide advice, but must report this to the appropriate Chair and the Sands Research and Prevention Team. They may subsequently be asked by the Chair to absent themselves from a discussion of the application concerned.

# Expectations

* 1. PEP members, other advisors and Trustees can expect that their comments will be treated in confidence by Sands staff. Applicants can expect that Sands staff will not disclose details of their applications to those outside the review process.
		1. Applicants should not, under any circumstances, directly approach members of the PEP, Research Subcommittee or Board in connection with their (or another's) research application.
		2. Research Subcommittee and Board members should refuse any requests for information or feedback from applicants on how a particular judgement was reached.

# Managing conflicts of interests

* 1. Where a member of the PEP, the Research Subcommittee or the Board is an applicant or co-applicant on a grant application, he or she must declare an interest and withdraw from any consideration of that application. That member will not receive documents pertaining to the application or receive reports of the funding discussion. He or she must retire from the meeting when the application is assessed. Details of discussion of that application will be deleted from any papers the member receives. This should also apply to Trustees who serve as panel members and are applicants in the grant round.
	2. Where the Chair of the PEP is an applicant or co-applicant on a grant application, he or she must declare an interest and withdraw from the meeting for the discussion of the application in which he or she has an interest. A Vice Chair will chair the meeting to prevent any undue influence.
	3. PEP members who could be seen as a direct competitor of the applicant (e.g. they are funded or applying for funding on a similar project to the proposal under discussion) or have collaborated or published with the proposal applicant within the past 3 years, or work in the same institution, 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.

# Resolution conflicts of interest

* 1. Sands 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. In a small number of cases, major conflicts of interest may arise which compromise an individual’s ability to continue in their position within the charity. Where such a situation relates to a member of the Research Subcommittee or Board, the matter will be discussed by the Chair of the Subcommittee or Board, as appropriate, and the Research and Prevention Lead. In cases where agreement cannot be reached through this means, the case will be referred to the Subcommittee or Board as a whole, whose decision should be taken as final. Members of the Research Subcommittee and/or Board are expected to declare any potential conflicts of interest relating to individual funding decisions to the committee secretariat before the meeting wherein they will be discussed, or during the meeting as soon as the existence of a conflict becomes apparent. In cases where an individual is uncertain as to whether a conflict of interest exists or not, they should report this to the Research and Prevention Lead. The secretariat shall discuss the matter with the individual as necessary and report to the Chair, who will decide on a course of action.
	2. If an individual is concerned about a possible conflict of interest involving another member of the Research Subcommittee or Board, then he or she should raise the matter with the respective Chair.

# Updating the policy

* 1. Sands will endeavour to review this policy, every 2 years, in consultation with the Board of Trustees.

This policy was approved by the Sands Board of Trustees May 2016