



EDCTP policy on Conflict of Interest

Introduction

In order to achieve the objectives set out in the Joint Programme EDCTP needs to ensure that the review process of grant applications or other EDCTP activities are carried out in an independent atmosphere free of direct and indirect pressures. To assure integrity and impartiality, it is necessary to avoid situations that might interfere or compromise these activities.

The EDCTP principles for managing potential conflict of interest (and even the suspicion of them) are described in this document. Any individual involved in the implementation of EDCTP should understand fully the terms of his/her appointment, duties and responsibilities, and act accordingly. This policy stipulates guidelines for any member of the EDCTP secretariat and constituencies, as well as others to be involved with EDCTP on a regular and/or freelance basis.

What is a Conflict of Interest?

- A conflict of interest means the individual has to declare any financial or other interest that could unduly influence the performance of the individual with respect to the subject-matter being considered. Conflicts of interest may arise in particular from economic interest, political or national affinities, organisational, family or emotional ties or any other common interest(s) that is/are liable to influence the impartial and objective performance of the task of the individual.
- Assessing whether a declared interest constitutes a conflict is based on special circumstances whether this interest will influence the individual's performance. Significant is the crucial element how to retain the confidence in this individual's impartiality. With regard to the transparency of the review process of EDCTP grants this impartiality will be the basis for confidence by all parties involved.
- Potential conflict of interest may continue when the individual is uncertain whether this interest should be reported or not to be reported.

The following types of situation need to be declared:

1. **Personal involvement:** A potential interest may be said to exist whenever an individual who is to participate in any way in the process leading up to a grant decision – whether, for example, as a referee, member of an assessment/prioritisation committee, programme secretary or member of the decision-making body – has a personal involvement with any of the relevant applications or applicants.
Forms of personal involvement with an application *and* applicant are:
 - a. being an applicant or co-applicant submitting an application for consideration.
Forms of personal involvement with an application are:
 - b. being a supervisor, project leader or advisor to a project for which grant is being sought in the relevant round;
 - c. having any other professional connection with a project for which grant is being sought in the relevant round;
 - d. providing a letter of recommendation for a project for which grant is being sought in the relevant round;
 - e. being in the management group (dean, institute director or head of research group) of any organisation/section of an organisation at which an applicant is employed;
 - f. being actively involved in permanent advisory board and being on the staff of the same section of an organisation (department/research school) or of the same



organisation (if it does not contain different sections) at which an applicant is employed.

Forms of personal involvement with an applicant in the current situation or in the past, that can unduly affect the outcome of the work, are:

- g. having been the applicant's supervisor at an earlier stage of his/her career (within approx. the last five years) and/or co-publishing or having co-published with him/her arising from joint research (within approx. the last three years);
 - h. having a family relationship with the applicant in the first, second or third degree;
 - i. sharing a household with the applicant and/or being the applicant's spouse or partner.
2. **Bias:** A potential interest may also be said to exist whenever (a) a committee member, whether or not personally involved with an application and/or applicant, is likely to be biased in favour or against a specific application (for example, because there are two opposing schools of thought in the area of study concerned) and is therefore likely to judge that application in a more positive or negative way than would otherwise be the case, or where (b) a committee member has a personal involvement with an application and that application displays a considerable overlap with another application in the same round. In the latter case, bias against the competing application (or at least the suspicion of it) cannot be ruled out.
3. **Disclosure of information:** A potential interest may likewise be said to exist whenever a committee member supplies details of proceedings or project data from the projects during the assessment process to anyone with an interest in its outcome. By disclosure of information in this way, the committee member concerned subordinates the interests of EDCTP to his/her personal interest in the individuals to whom he supplies the information.
4. **Economic interest:** A current financial interest, e.g. shares or bonds, where a committee member or an organisation with which a committee member is involved may benefit financially, directly or indirectly, from a decision made.

If the potential interest is not listed above, then the EDCTP Secretariat will evaluate possible interest that may affect the review process on a case-by-case basis.

When and how to declare?

Any individual involved, upon request by EDCTP Secretariat to perform particular duties and responsibilities for EDCTP, is required to report any interest and if requested so by the EDCTP secretariat to abstain themselves from decision-making processes when the declared interest as stated in this policy to EDCTP may affect these duties.

In case of a grant procedure EDCTP will invite individuals to assist in the review process of applications. When there are circumstances that may lead to a conflict of interest, or be seen by others, the individual is required to divulge sufficient information to EDCTP in order to allow the EDCTP secretariat in determining the case and to agree on the appropriate action.

Actions for EDCTP secretariat to manage Conflict of Interests

1. An individual must not sit on a review committee or take part in a decision making process if they are themselves applicants or co-applicants in the assessment round concerned.
2. If it can be avoided, an individual must not sit on an assessment committee if they have a category 1b – 1i personal involvement with more than one application or applicant in the assessment round concerned.
3. An individual who have a category 1b – 1i personal involvement with an application or applicant may sit on an assessment committee but must not take part in discussion or other talks (interview) relating to that application or applicant and must not vote on it.



During discussion of the proposal or any vote on it, they must leave the room and their absence must be recorded in the minutes.

4. Members of decision-making bodies who are themselves applicants or co-applicants (category 1a personal involvement) in a round on which the body concerned is to take a decision must not take part in decision-making on that round; in all other cases of personal involvement, the decision-making body must consider prior to the point of decision whether the relevant member(s) can be permitted to take part in decision-making without infringing proper standards of objectivity and must act on its conclusion. This process must be recorded in the minutes.
5. Personal involvement of reviewer (all categories) must be checked in advance by a Conflict of Interest form. A copy of this form must be completed and signed by each reviewer, returned to the EDCTP secretariat and archived on the assessment round.
6. Personal involvement of reviewers (all categories) must be checked once again at the start of each assessment or decision-making meeting. This process must be recorded in the minutes.
7. At the start of each assessment or decision-making meeting the members of the relevant committee or body must be explicitly reminded of their duty of confidentiality regarding the proceedings of the meeting (category 3 personal involvement). This process must be recorded in the minutes.

Conflict of Interest form

The information given on the form will not be disclosed publicly. EDCTP conforms to the legislation of The Netherlands concerning the Personal Data Protection Act.