

# Behavioural Research UK Leadership Hub Conflict of Interest Policy

# 1. Purpose & Background

A potential or actual conflict of interest may also pose a reputational risk for BR-UK. Conflicts of interest can be of a financial or non-financial nature or both, and may exist at the individual or institutional level. All conflicts of interest must be declared.

This document outlines the considerations and approaches to the identification and management of potential conflicts of interest.

# 2. Definitions

Term	Definition
Conflict of Interest	A conflict of interest arises in circumstances where there is potential that professional judgment or actions regarding a primary interest will be unduly influenced, or may reasonably be perceived to be unduly influenced, by a secondary interest.
Individual Conflict of Interest	A conflict of interest involving an individual that may actually, or reasonably be perceived by others in the public health community to unduly, impair or unfairly influence their professional judgement when executing their role within BR-UK.
Institutional Conflict of Interest	A circumstance, situation or interaction involving a BR-UK member organisation or affiliate and an external organisation that may actually, or reasonably be perceived by others in the public health community to:  • Unduly influence BR-UK's primary aim and objectives and/or • Unduly influence the independence and objectivity of BR-UK's work.

# 3. Statement

BR-UK staff have multiple roles both inside and outside of the Hub and have external relationships that are many and varied. This can include links with academic, private, public and/or voluntary sections in addition to local, national or even global communities and groups. As a result, current or potential conflicts of interest could arise. This is often through circumstances entirely beyond the control of an individual or which could not be foreseen.

Recognising and reporting that a conflict of interest may exist, or seeking advice on a potential conflict or interaction, is entirely proper, and reflects positively on an individual's integrity. Conflicts of interest can be actual or perceived to be an actual conflict by others outside of the circumstance. Declared conflicts of interest carry no implication of wrongdoing and are often unavoidable as part of an individual's many roles. However, they must be disclosed and, in some cases, may preclude someone from performing a particular role.



Members of BR-UK have a duty to consider the implications of any past, current or potential external relationships or circumstances that may, or could be perceived to, undermine the aims or reputation of the Hub.

It is expected that members will have real or potential conflicts and this is acceptable as long as members are transparent and declare them where necessary and take steps to actively manage and reduce the conflict of interest to ensure that it is not detrimental to the reputation or research which BR-UK is undertaking.

Declaring a conflict is most likely to be the singular action required unless that declaration will, or could be perceived to, undermine the Hub reputation or the integrity of its outputs.

# 4. Process

Members are encouraged to review the connections, relationships, funding or other relevant links with others and to consider whether those links may impair their judgement or affect their research outputs.

Members should also consider how others (such as stakeholders or the general public) would view such links.

All those affiliated with BR-UK are required to complete an initial Declaration Form online via a link provided directly to them and an annual declaration thereafter. Those unable to complete the form online may complete the form included at the end of this Policy and submit this to the Programme Manager via email.

The Directorate will review conflicts and categorise them as follows:

- The declared circumstance is not a conflict as defined by BR-UK or does not pose a
  reputational risk, or it is not a significant enough conflict or risk to warrant action and
  either should be kept under review or closed.
- The declared circumstance poses a sufficient conflict or reputational risk to require exclusion of the individual from specific topics or aspects of BR-UK activity.

If the conflict is categorised as having a sufficient or severe risk to the reputation or integrity of BR-UK outputs, members should take action which may include:

- Discontinuing the research
- Severing the link/relationship
- Divesting of financial interests
- Excluding themselves from specific tasks or projects.



#### **Further Considerations**

Due to the cross-disciplinary nature of BR-UK, members must take a broad consideration of potential risks and conflicts that may be relevant in some disciplines but not others, particularly where such circumstances or interactions may have implications for their BR-UK colleagues. This does mean that there may be occasions where those within BR-UK engage with disciplines, groups or individuals with whom they would not normally have an established relationship for the purposes of research (including deliberative research). Links with those involved in the production, manufacture or promotion of alcohol, tobacco, ultra-processed foods, gambling and/or pharmaceutical industries may be problematic for members of BR-UK working within the health and wellbeing discipline. Furthermore, those working on environmental issues may have similar concerns regarding engagement with the fossil fuel industry.

Members should flag any considerations, caveats or exclusions to the directorate at their earliest convenience in order to ensure expectations are managed.

# Acknowledgements

This policy was informed in part by: Martin S, Fitzgerald N, Arnott D, et al. "SPECTRUM Consortium: Management of Interests and External Interactions Policy." <a href="http://dx.doi.org/10.7488/era/2074">http://dx.doi.org/10.7488/era/2074</a>.

This policy aligns with UKRI policy and guidance on conflicts of interests and should complement institutional approaches to management of interests. Further information on UKRI policy can be accessed at:

- Conflicts of interests UKRI
- <u>UKRI declaration of interests: policy and guidance UKRI</u>

# Change History

Printed copies of this document are not controlled – should you wish to access the latest version of the policy, please email the Hub Manager (Sancha.martin@ed.ac.uk).

Change Made By	Effective Date	Summary of change	If significant, who approved the change:



This form should be completed online via the link provided by the Hub Programme Manager.

This document outlines the questions to be addressed. If you are unable to complete the form online, please use this Word version and return to the Programme Manager.

# **Declaration Form**

Your Name:
Your Employer:
Email Address:
Date:
When completing this form, you should consider your individual circumstances and declare anything which you think is relevant.
You should consider and describe any and all conflicts, interactions or interests including any which have been initiated, are active, or have ended within the past four years from the date you are completing this form.
If in doubt about whether a collaboration or interaction is covered by the scope of the policy as outlined above, please give brief details and highlight to enable the Directorate to review and provide advice. This includes known indirect interests relating to those close to you, such as family or friends.
Academics do not need to complete the form to reflect their universities potential or actual conflicts that do not directly involve them. Those employed by other organisations should declare any known actual or potential institutional conflicts of interest.
Please answer each of the questions below.
Q1: Do you have any financial interests relating to any individual, group, institution, commercial sector or industry, (including, but not limited to, receipt of pay, commission, consultancy fees, equity, forgiveness of debt, property, royalties, travel expenses, in-kind support, or anything of monetary value) that could be perceived to influence your judgement as it relates to BR-UK research activities?
Yes No No
Q2: Do you have any non-financial interests relating to any individual, group, institution, commercial sector or industry that could be perceived to influence your judgement as it relates to BR-UK research activities?
Yes No



Q3: During the past 4 years, have you held a paid office or other post, where you represented interests or defended a position related to the areas of interest to BR-UK with the intention of benefiting or promoting any specific individual, group, institution or industry that may be contrary to the BR-UK vision? (consider both paid and unpaid roles).
Yes No No
Q4: As part of a regulatory, legislative or judicial process, have you provided expert opinion or testimony, for the benefit of any individual, group, institution, commercial sector or industry which may operate in a way that is contrary to the BR-UK vision, for which you have been financially reimbursed?
Yes No No
Q5. Do you have any intellectual property rights (IPR) (such patents, trademarks, or copyrights, proprietary know-how in a substance, technology or process) that might be enhanced or diminished by the outcome of BR-UK research?
Yes No No
Q6: To the best of your knowledge, have you had any professional collaboration with any entity or individual which has received funding from, or themselves have a professional collaboration with others who may operate in a way that is contrary to the BR-UK vision?  Yes \[ \Boxedom \text{No} \Boxedom \Boxedom
Q7: Do you have, or are you aware of any other circumstances not declared elsewhere in this form which have led, lead or have the potential to lead to an actual or perceived conflict of interest and/or any interactions or activities which could pose a reputational risk to the BR-UK Hub Consortium (either to its research or the individuals involved) that you wish to disclose or request advice on?
Yes No No
If you have answered Yes to any of the above questions, please provide details below.





# Disclosure Consent

hest of my knowledge

By completing and signing this form:

- I agree to undertake to be vigilant of these issues raised in this policy document and to follow the guidance provided which describes how to identify potential risks and conflicts.
- I understand that I can request support and advice from the Directorate at any time prior to any interactions which may have the potential to fall under this policy and should do so in advance of any such interactions where reasonably practicable.
- I consent to the disclosure of any relevant conflicts to other BR-UK participants and in the resulting report or work outputs as deemed necessary by the Directorate.
- I agree to promptly notify the BR-UK Hub Manager either verbally or in writing of any new circumstances arising which fall under the scope of this policy AND complete a new declaration of interest form that describes the changes. This includes any change that occurs throughout the time I am affiliated in any way with BR-UK and its activities.

DECLARATION. I hereby declare that the disclosed information is true and complete to the

best of my knowledge.		
Date:		
Signature:		
Print Name: .		

