

<b>Title:</b>	<b>Research Grants Committee Code of Conduct</b>
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## 1. Context

All members of the Research Grants Committee (Trustees, External Advisers and Executive Officers) must abide by the principles and procedures set out in The Dunhill Medical Trust Conflict of Interest Policy. It is however recognised that there are times when specific conflict of interest issues can arise in respect of grant applications and other grant-related matters that apply particularly to the Research Grants Committee. A code of conduct for dealing with these is therefore set out below as an appendix to the main Conflict of Interests policy. In formulating this code, Charity Commission guidelines and Association of Medical Research Charities (AMRC) guidelines have been taken fully into consideration.

## 2. Duties and responsibilities of the Research Grants Committee

The main purpose of the Research Grants Committee (RGC) is to make recommendations to the Board of Trustees on which grant applications which should be supported and which rejected. The RGC will base its funding decisions solely on quality:

- using a rigorous internal and external peer review system for judging research and research-related applications; and
- having regard to the evidence base underpinning applications, as well as the potential of the project to achieve real impact and increase the capacity for research in the Trust's areas of focus.

The Trustees have a responsibility to ensure that those who advise them on grant making activities are acting in the best interests of the charity and are not driven (or are not perceived to be driven) by undue influences, or the expectation of personal gain. It is therefore the duty of the Committee to ensure that assessment of grant applications and advice on the development of grant making policy is carried out as impartially and objectively as possible.

## 3. Grant applications in which members of the RGC have an interest

- Members of the RGC who are External Advisers may apply for funding (whether as lead applicant or co-applicant). Members of the Committee who are Trustees may be named as a co-applicant on a grant application but may not be named as the lead applicant.
- An exception to the above rule applies to the Chair of the Committee, who may not apply for funding during his/her term of office.
- Any Vice Chair appointed to the Committee may not be affiliated to, or have significant links with, the same institution as the Chair of the Committee. The Vice

Chair may not apply for funding as the lead applicant but may be named as a co-applicant.

- Members wishing to submit a grant application will abide by the guidelines governing submission of grant applications and their application will in no way receive any form of preferential consideration and will be judged on merit alone.
- The rules in respect of conflicts of interest relating to meetings set out in the Conflicts of Interest Policy will apply to all grant applications (both research and non-research) where a Trustee or External Adviser of the Committee has an interest.
- All conflicts of interest arising from grant applications must be declared at or before the relevant meeting(s) where the application will be considered for support and will be recorded in the minutes of the meeting. A list of all conflicts of interest will be circulated with the papers prior to the meeting.

#### **4. Discussion of grant applications**

- All discussions at RGC meetings that relate to grant applications are strictly confidential.
- Details of grant applications, meeting papers and related correspondence, and the names of external referees and contents of referees' reports are strictly confidential and should not be discussed with, or shown to, persons outside the forum of the Committee.
- With the exception of discussions between the Chair of the Committee and the Executive Director and members of the grants team for administrative purposes, any discussion of a grant application between members of the RGC which occurs outside a Committee meeting should be declared to the Chair and/or Executive Director.
- If a member is approached by a grant applicant for technical advice on a grant application, then he or she may provide advice, but must report this to the Chair of the RGC and/or the Executive Director. If deemed appropriate, he/she may subsequently be asked by the Chair to absent him/herself from a discussion of the application in question.
- If the advice sought by an applicant is in relation to administration, or to seek information on the status of their application, the member should refer the applicant to an executive officer of the Trust.
- Feedback to unsuccessful applicants may be provided on request or may sometimes be given unsolicited if the Committee considers that this will be particularly beneficial to the applicants in improving their proposal for resubmission elsewhere. This feedback will normally be conveyed in writing by an executive officer, in the form of comments made by the Committee, or anonymised comments from referees' reports where a referee has indicated that such unattributed feedback may be given.

#### **5. Resolution of conflicts of interest**

##### **5.1 Direct interests:**

A member will be automatically excluded from participation in both discussion of an application and the 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 member concerned is the named lead applicant on the grant application;
- the member is a named co-applicant on the grant application;

- a relative<sup>§</sup> of the member is the lead applicant or co-applicant;
- a named applicant on the proposal is a business partner or research collaborator of the member;
- a named applicant is a colleague within the same department and/or research group as the member concerned
- the member concerned has a formal relationship with the applicant charity/organisation (eg. as trustee, professional adviser, patron etc.)

Where a member is excluded from a funding decision on the basis of a direct interest, he/she will withdraw from the meeting whilst the application in question is being discussed and will not take part in the funding decision. He/she will not receive the application itself, or any related papers (including referees' reports and the relevant draft minute(s) of the discussion and/or decision).

<sup>§</sup> For the purposes of this document, the term 'relative' includes, but is not limited to, a spouse or partner (current or past), child, sibling and parent.

## **5.2 Indirect interests:**

An indirect interest applies where a funding proposal is from the same host institution as that of the member but is from a different department/school and/or the applicant(s) are not known personally to the member.

In the case of an indirect interest, the member may receive the relevant papers and take part in the discussion if the interest has been declared prior to the meeting and the member's participation is deemed to be appropriate by the Committee Chairman.

## **5.3 Exclusion at the Trust's discretion:**

In certain other situations, a member may be excluded from discussion of a grant application at the Trust's discretion. Examples of such situations include:

- the member concerned can be seen as a direct competitor of the applicant (eg. they are currently being funded, or are currently applying for funding, for a project of a similar nature to the proposal under discussion);
- the member has acted as an external referee, 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 member has collaborated or published with the lead applicant within the past three years;
- a named applicant is a member or employee of the same institution<sup>§</sup> as the member concerned;
- the member 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.

<sup>§</sup> For the purposes of this document, federated institutions (e.g. the University of London) should not be regarded as a single institution.

In any of the above cases, the particular situation will be discussed by the Chair of the RGC and the Executive Director, who will decide on one of the following options:

- the member will be allowed to participate fully in the funding decision; or

- the member may comment on the proposal, but not take part in the funding decision;  
or
- the member will absent him/herself from the meeting while the proposal is being discussed and a decision taken.

In cases where a member is uncertain as to whether a conflict of interest exists or not, he/she should report this to the Executive Director, who will in turn discuss the matter with the Chair of the RGC, and a decision will be taken based on the provisions set out above.

If a member is concerned about a possible conflict of interest involving another member of the RGC, he/she should raise the matter with either the Executive Director or the Chair of the Committee, who will deal with the matter in line with the options set out above.

## **6. Responsibilities in respect of information security and data protection**

The Dunhill Medical Trust provides policy statements and guidance for staff, Trustees and Committee members in relation to compliance with relevant legislation to help prevent breaches of the DMT's legal obligations. However, individuals are ultimately responsible for ensuring that they do not breach legal requirements during the course of their work and/or association with the Trust.

Users of the Trust's online or network services are individually responsible for their activity and must be aware of the relevant legal requirements when using such services.

The Trust must comply with all relevant legal requirements whether such requirements are detailed in internal policies or not. Any suspected breach of the DMT's legal requirements must be reported to the Executive Director.

Committee members must familiarise themselves with the Trust's Information Security policy, related sub policies and its policy on Data Protection.

Briefing documents, policy documents and papers relating to Committee meetings are routinely made available via the secure area of the Trust's website. Committee members will also be provided with secure access to the Trust's Grants Management System. Members should avoid downloading papers, grant applications and other material from these sources onto personal devices, external hard drives or print them in hard copy. It is acknowledged, however, that sometimes it is necessary or practical to do so. In those circumstances, Members should ensure they comply with the terms of the Information Security policy on Mobile Computing and Remote Working, ensuring that they retain the information for no longer than is necessary for carrying out the task and ensure that copies are destroyed securely in the manner set out in the Information Handling policy.

Members should exercise particular care in transmitting personal data by email. Email is, by its nature, not particularly secure, therefore anything with personal data content should be sent via a password-protected attachment, unless end to end encryption is used, with the password sent under separate cover.

On resignation or completion of their terms of office, Members should ensure that all Trust-related documents and email correspondence are deleted from their personal devices or returned to the Administration and Governance Officer for secure destruction.