# BI-HR-008 CONFLICTS OF INTEREST POLICY

## Document reference

<table>
<thead>
<tr>
<th>Policy number:</th>
<th>BI-HR-008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Owner:</td>
<td>Simon Jones, Chief Operating Officer</td>
</tr>
<tr>
<td>Date:</td>
<td>16 January 2020</td>
</tr>
<tr>
<td>Version:</td>
<td>1.0</td>
</tr>
<tr>
<td>Status:</td>
<td>Active</td>
</tr>
<tr>
<td>EIA number:</td>
<td>BI-HR-008-EIA</td>
</tr>
<tr>
<td>Last reviewed:</td>
<td>16 January 2020</td>
</tr>
<tr>
<td>Next review:</td>
<td>June 2021</td>
</tr>
</tbody>
</table>

## Version control

<table>
<thead>
<tr>
<th>Date</th>
<th>Version</th>
<th>Status</th>
<th>Summary of Changes</th>
</tr>
</thead>
<tbody>
<tr>
<td>16 January 2020</td>
<td>1.0</td>
<td>Active</td>
<td>New in the 2020 Policy Review</td>
</tr>
</tbody>
</table>

## Document approval

<table>
<thead>
<tr>
<th>Document version:</th>
<th>1.0</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document approved by:</td>
<td>Babraham Executive Committee</td>
</tr>
<tr>
<td>Position:</td>
<td>N/A</td>
</tr>
<tr>
<td>Date:</td>
<td>16 January 2020</td>
</tr>
</tbody>
</table>

## Distribution

<table>
<thead>
<tr>
<th>Name or Group</th>
<th>Date of issue</th>
<th>Version</th>
</tr>
</thead>
<tbody>
<tr>
<td>All staff and associates</td>
<td>18 January 2021</td>
<td>1.0</td>
</tr>
</tbody>
</table>

## Associated policies, procedures and guidance

This policy should be read in conjunction with:
- Declaration of Interests Form
- BI-COR-007 Fraud & Bribery Policy
- BI-KEC-002 Consultancy Policy
- BI-COR-002 Trustee Conflicts of Interest Policy


Contents
1. Definitions.................................................................................................................................3
2. Commitment statement ..............................................................................................................3
3. Purpose.......................................................................................................................................3
4. Scope ..........................................................................................................................................4
5. Declaration of interests ................................................................................................................4
6. Data protection ..........................................................................................................................5
7. What to do if you face a conflict of interest in your role ..............................................................5
8. Decisions taken where you have an interest ................................................................................5
9. Other potential conflicts .............................................................................................................6
10. Connected persons, companies & bodies ..................................................................................6
11. U.S. Department of Health & Human Services & Public Health Services Regulations .............6
12. External organisations ...............................................................................................................7
13. Further information ..................................................................................................................7
1. **Definitions**

   “Employee” Institute employees on Institute or Babraham Institute Enterprise Ltd (BIE) terms and conditions, Institute employees on BBSRC or other terms and conditions, and Research Fellows on Institute terms and conditions.

   “Staff” Employees and Babraham Institute registered PhD students.

   “Individuals” Staff and Research Fellows (honorary).

2. **Commitment statement**

   2.1. At the Babraham Institute our mission is to be an international leader in research focusing on basic cell and molecular biology with an emphasis on healthy ageing through the human lifecycle.

   2.2. We are committed to ensuring the highest standards of integrity, honesty and professionalism and strive to embed good practice in every aspect of our work.

3. **Purpose**

   3.1. The aim of this policy is to protect both the Institute and individuals from any appearance of impropriety.

   3.2. Conflicts of interest may arise where an individual’s business, personal or family interests and / or loyalties conflict with those of the Institute. Such conflicts can:

      - Inhibit free discussion
      - Result in decisions or actions that are not in the interests of the Institute
      - Risk the impression that the Institute or individual has acted improperly

   3.3. This policy complies with expectations set out in the UKRI-BBSRC Institute Standard Conditions of Grant and meets U.S. Department of Health and Human Services and Public Health Services Regulations for funding from Public Health Service providers.

   3.4. The Institute encourages openness and transparency in declaring conflicts of interest in line with:

      - The Universities UK Concordat to Support Research Integrity¹
      - The RCUK Policy and Guidelines on Governance of Good Research Practice²
      - BBSRC’s Safeguarding Good Scientific Practice³

---

¹ [https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/the-concordat-for-research-integrity.aspx](https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/the-concordat-for-research-integrity.aspx)

² [https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/the-concordat-for-research-integrity.aspx](https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/the-concordat-for-research-integrity.aspx)

³ [https://bbsrc.ukri.org/about/policies-standards/good-scientific-practice/](https://bbsrc.ukri.org/about/policies-standards/good-scientific-practice/)
4. **Scope**

4.1. This policy applies to:
   - Institute employees on Institute or Babraham Institute Enterprise Ltd (BIE) terms and conditions
   - Institute employees on BBSRC or other terms and conditions
   - Research Fellows on Institute terms and conditions
   - Research Fellows (honorary)
   - Babraham Institute registered PhD students

4.2. Trustees should refer to the Trustee Conflicts of Interest Policy (BI-COR-002).

5. **Declaration of interests**

5.1. Individuals must declare their interests in connection with their role at the Institute. A Declaration of Interests Form is provided for this purpose, listing the types of interest that should be declared (see also 5.3 and 5.7). This is available from the Institute Director’s Executive Assistant.

5.2. To be effective, the Declaration of Interests Form must be completed upon starting at the Institute, and needs to be updated at least annually or when any changes occur. It is the individual’s responsibility to keep their conflicts of interest declaration up to date when their circumstances change. It is expected that the vast majority of individuals will only need to make a null return.

5.3. Interests to be declared include the following activities taking place outside of the Institute and its wholly owned subsidiaries:
   - Shareholdings
   - Consultancies (paid and unpaid)
   - Paid academic work
   - Written paid work
   - Other interests (see Section 9 for further information)
   - Connected party conflicts (see Section 10 for further information)

See the Declaration of Interests Form for further information.

5.4. If you are not sure what to declare, or whether / when a declaration needs to be updated, you should err on the side of caution. The Institute Director’s Office can be approached for confidential guidance.

5.5. Interests will be recorded on the Institute’s Register of Interests, which will be maintained by the Institute Director’s Office. The register will be accessible by the Institute Director, the Chief Operating Officer (COO) and the Institute Director’s Office. The COO will review the Register of Interests at least annually. The Babraham Executive Committee (BEC), the Audit Committee and / or the Board of Trustees may be notified of significant conflicts of interest.

5.6. For significant conflicts of interest, a management plan may be put in place with the individual to help manage, reduce or eliminate the risk.
5.7. Consultancies should be set up in line with the Institute’s Consultancy Policy (BI-KEC-002) and declared on the Declaration of Interests Form.

5.8. Declarations of gifts and hospitality received should be made separately in accordance with the Institute’s Fraud and Bribery Policy (BI-COR-007).

6. **Data protection**

6.1. Information provided will be processed in accordance with data protection principles set out in the General Data Protection Regulations (GDPR) and Data Protection Act 2018. Data will be processed only to ensure that individuals act in the best interests of the Institute. Conflicts declared may be made public in line with best practice for charitable organisations, and to promote openness and transparency in research. The information provided will not be used for any other purpose.

7. **What to do if you face a conflict of interest in your role**

7.1. If you face a conflict of interest in your role at the Institute, you should not be involved in decisions made by the Institute that directly relate to that conflict. You should declare your interest at the earliest opportunity (e.g., to your line manager or at the start of a meeting / as soon as you realise during the meeting) and withdraw from any subsequent discussion. For example, you should not be involved in discussing deals with companies with which you have a personal connection. The same applies if you face a conflict for any other reason. It is your line manager or the Chair’s final decision how the conflict is managed and to ensure that this is documented appropriately (see 8.1).

7.2. You may, however, participate in discussions from which they may indirectly benefit, e.g., where the benefits are universal to all, or where the benefit to you is minimal.

7.3. A management plan may be put in place with the Institute Director should conflicts of interest arise regularly in the course of your work. This will be monitored regularly, in accordance with the agreed review period.

8. **Decisions taken where you have an interest**

8.1. In the event of the Institute having to decide upon a question in which you have an interest, you will be expected to leave the discussion. If there is not a consensus among the remaining individuals, all the decisions will be made by vote, with a simple majority required. Where applicable, a quorum must be present for the discussion and decision; interested parties will not be counted when deciding whether the meeting is quorate. Interested individuals may not vote on matters affecting their own interests.

8.2. All decisions under a conflict of interest will be recorded and reported in writing, for example, in the minutes of the meeting, and a note sent to the Institute Director’s Office. The report should record:

- The nature and extent of the conflict
- An outline of the discussion
- The actions taken to manage the conflict
8.3. Independent external moderation will be used in the unlikely event that conflicts cannot be resolved through usual procedures.

9. **Other potential conflicts**

9.1. Individuals should also have due regards to whether external activities and interests, including political activities, may create a conflict of interest. For example, being a Trustee of another organisation that is competitive with the Institute or campaigning on an agenda contrary to Institute policy. Individuals who are seeking elected office (e.g., as MP, MEP or Cambridgeshire Councillor) should discuss the matter with the Institute Director because of the significant public funding to the Institute.

10. **Connected persons, companies & bodies**

10.1. In considering conflicts of interest, you should consider not only your own activities but also those of any connected persons, companies and bodies. The following are deemed ‘connected’ with you:

- Anyone living with you as your partner.
- Your children, step-children, partner’s children and step-children, parents, grandchildren, grandparents and siblings; and their partners.
- A Trustee of any private trust of which the beneficiaries or potential beneficiaries include you or anyone mentioned above.
- Your business partners or business partners of anyone mentioned above.
- Firms or businesses in which you or anyone mentioned above (or you acting together with anyone mentioned above) is a partner, has ownership of at least one-fifth of the shares in the company, the ability to direct how at least one-fifth of the voting power in the company is exercised or has the ability to otherwise ensure that the affairs of the company are conducted in accordance with their wishes.

11. **U.S. Department of Health & Human Services & Public Health Services Regulations**

11.1. Senior and key personnel participating in research funded by a U.S. Public Health Service (PHS) funder, most notably the National Institutes of Health (NIH), must follow the requirements set out below. The Grants Office is responsible for this process; please speak to them for advice.

11.2. The Financial Conflicts of Interest Policy to meet U.S. Department of Health and Human Services and Public Health Services Regulations is publicly facing on the Institute’s website in compliance with the Regulations. For key definitions and further detail, see the Institute’s website.

11.3. The U.S. Department of Health & Human Services & Public Health Services Regulations apply to any institution (non-U.S. or U.S. domestic) that is applying for or receives research funding from a PHS funder through a grant or cooperative agreement (either directly or via another

---

机构作为下级受让方)和，相应地，任何计划参与或已经参与此类研究的研究人员必须披露任何与机构职责相关的重大财务利益（SFI）。温德，任何SFI和FCOI的识别通常会构成对机构的冲突利益，因此也应通过机构的申报利益声明报告（参见第5节）。

11.4. 所有研究人员必须向其机构披露重大财务利益（SFI）。

11.5. 当SFI被判断为FCOI时，将制定一个管理计划，由研究人员、机构主任和资助办公室共同制定，以帮助管理、减少或消除FCOI。

11.6. FCOI和管理计划的披露必须提交给PHS资助方的资助办公室。

11.7. 管理计划的遵守情况必须监控。资助办公室负责这项工作。

11.8. 所有PHS资助的研究人员必须完成财务利益冲突培训，详情请参阅此处5。请通知资助办公室您已经完成培训，以便他们维持记录。

11.9. 年度FCOI报告要求。作为直接接受PHS资金的机构，任何FCOI必须在NIH通过eRA Commons在60天内报告。作为下级受让方，FCOI将在10天内报告直接接受PHS资金的机构。记录将由资助办公室保存三年。

11.10. 在任何PHS资金的支出之前，对已经披露的SFI中被判断为FCOI且与PHS资助的研究有关的信息，必须在五个工作日之内以书面形式作出公开回复。

12. 外部组织

12.1. 该机构认识到，个人可能被要求向外部组织申报冲突利益，尤其是作为资助申请、同行评审或发表在学术期刊的一部分。这是个人的责任，必须根据外部组织的政策或指导来遵守这些要求。该机构鼓励开放性和透明性申报利益，与英国大学联合支持研究诚信、RCUK政策和指导方针以及BBSRC的保护良好科学实践。额外的支持可以从资助办公室寻求。

13. 进一步信息

13.1. 该政策将定期审查，以纳入任何变更，立法或其他。下次审查日期将载于封面。

13.2. Associated policies, procedures and guidance are listed on the cover sheet. The Policy Owner named on the cover sheet can be contacted with any queries.

13.3. This policy may be varied, withdrawn or replaced at any time by the Institute at its absolute discretion.