

Conflict of Interest Policy

Version	1.0
Contributors	PACE JPDG and legal review by Michael Pritchett
Last Updated	15 Mar 2024
Last Updated By	Beverley Isherwood (applied JPMB amends)
Summary of Updates	Approved by JPMB on 13 March 2024

Managing Conflicts of Interest (or “Col”)

The purpose of this document is to manage conflicts of interest (Col) that may arise with both internal and external reviewers and an applicant to a PACE funding call (an “Applicant”). The managing of the Col is done in connection with the involvement of such reviewers in providing input, feedback, due diligence and funding decisions in relation to a PACE funding call.

Definition of a conflict of interest

A conflict of interest occurs for a reviewer when your decision might be, or might be perceived to be, influenced (or otherwise affected) by some potential personal benefit arising from your decision. This benefit could be financial, reputational or career-related and includes instances where the benefit would be to any person(s) close to you or towards whom you have some loyalty or responsibility. As a non-exhaustive list of potential examples, a reviewer would report under this Col Policy when you:

- Are a close friend, patient or relative of the Applicant;
- Are directly involved in the work that the Applicant proposes and/or have contributed to the application;
- Have recently collaborated with the Applicant (within the last two years);
- Are currently employed (or a consultant or similar arrangement) at the same institution as the Applicant (or have been within the last two years);
- Are a close collaborator or provide services to or have other similar professional relationship(s) with the Applicant;
- Are a trustee/director of the Applicant, a member of their advisory board or hold any other honorary role or position (whether paid or unpaid);
- Are the PhD Supervisor of any person involved in the Project on behalf of the Applicant;
- Have submitted an application to the same round for which you are being asked to provide a review;
- Have already reviewed the proposal at a different funding body;
- Have been approached and agreed to be a member of a committee connected with the research project (for example an advisory group or steering committee);
- Are involved in work that could compete with the work that the Applicant proposes in their application; or
- Have a commercial or financial/pecuniary interest. For example, if you are part of an organisation that may benefit financially, directly or indirectly, from any decision made.

Note that any reference to an Applicant above shall include proposal co-applicants as well as any key partners and sub-contractors in connection with the proposal.

Identifying a reviewer/panellist conflict

The PACE Management Team will attempt to identify conflicts during assembly of the review panel. The PACE Management Team has representatives from the Consortium Partners and is established to oversee the delivery and operations of the Programme.

Prior to receiving any confidential information relating to a proposal, reviewers (including MDC, LifeArc and IUK employee reviewers) will be required to declare any potential or actual conflict of interest (as defined above) by reading a non-confidential summary of the proposal (which includes sufficient information to allow them to identify any conflict). The above “definition of a conflict of interest” section will be provided to the reviewers as a stand-alone document to assist them in this process. It should also be made clear to the reviewers that they are expected to disclose any potential or actual conflict of interest that may come to light following this initial conflict check (for example, if upon reading the full proposal, they become aware of a conflict that should be declared).

Employees of MDC, LifeArc and IUK should also be vigilant in identifying if any reviewers might have potential or actual conflicts of interest that are not declared, based on their knowledge of the reviewers.

MDC, LifeArc and IUK reviewers should note that that conflicts of interest include situations where the organisation to which they might have some loyalty or responsibility is MDC, LifeArc or IUK itself and such organisation stands to benefit. See also sections below “Final PACE Decision Makers” and “Written record of ColS”.

Managing a conflict

When any potential or actual conflict has been identified, the PACE Management Team will review and decide the degree of materiality. In doing so, the PACE Management Team will take into account:

- The potential value of the benefit;
- The nature of the benefit (for example, a conflict where the reviewer has provided some ad hoc Key Opinion Leader KOL services to an Applicant would be less material than if the reviewer were on the SAB of the applicant); and
- The proximity of the conflict (for example, a conflict where the reviewer was a distant colleague of an Applicant a year ago at a large institution may be less material than if the reviewer were part of the proposal).

The decision will be made within the PACE Management Team by either (i) a meeting of representatives of the three managing partners of the PACE programme (“Meeting”) or (ii) by way of an exchange of emails between representatives of the three managing partners of the PACE programme (“Email Exchange”). The quorum for a Meeting shall be that there are present at least one representative of each of Medicines Discovery Catapult, LifeArc and IUK (with each such member being permitted to waive in writing (including, for the avoidance of doubt, by email) the requirement for any of its representatives to be in attendance for any specific meeting). Decisions by a Meeting shall be by way of unanimity of those present. For approval by Email Exchange at least one representative of each of MMDC, LifeArc and IUK must be involved and approve the decision.

Any conflicts that relate to the said representatives shall be discussed within the PACE Management Team as to the process to follow.

Conflicted reviewer who is reviewing individual proposal(s)

If a conflict is declared by an external expert reviewer who has been asked to comment on a ‘per-application’ basis, they will not be provided with the proposal depending on the decided materiality of the conflict, and the PACE Management Team may consider sourcing an alternative reviewer in relation to other applications.

Conflicted member of the selection panel/committee

Non-Conflict. If there has been a determination by the PACE Management Team (see above section “managing a conflict”) that the potential conflict is in fact not present or not sufficiently material to prevent the member from participating in the selection panel, then the member will be allowed to participate in full in the usual way and no declarations need be made to the panel or otherwise.

Limited Materiality Conflict. If a member of the selection panel is conflicted on an application but it has been determined by the PACE Management Team (see above section “managing a conflict”) to be of limited materiality, then the member shall be allowed access to the application and may participate in all respects in relation to the selection panel process (including, for the avoidance of doubt, participating in the discussions regarding the application) but will not be allowed to provide any scoring, ranking and final recommendations (such as fund or don’t fund). The existence of the limited materiality conflict will be openly declared to all members of the panel prior to the panel discussion on the application. An example would be where an application includes Medicines Discovery Catapult, LifeArc or IUK providing services as a part of the proposal and the panel member is an employee of the organisation.

Material Conflict. If a member of the selection panel is materially conflicted (as determined by the PACE Management Team (see above section “managing a conflict”)), they will be recused from making any recommendations on the conflicted application. They:

- won’t receive any application documents;
- won’t know who else has reviewed the application or read the reviewers’ comments;
- won’t score the application;
- will be asked to leave the meeting while that application is discussed; and
- won’t be given any details of the discussion after the meeting.

Key Material Conflict. If the member of the selection panel has a sufficiently material conflict (as determined by the PACE Management Team (see above section “managing a conflict”)) that would impact on the assessment by that member of any application, then they will be politely informed that they need to step down from the panel and will not be involved further in the process or have access to any application or process information. An example would be where the member is an applicant themselves or a key part of the application of another applicant.

Written record of Cols

The PACE Management Team will maintain a clear written record of all reviewed Cols, and the decisions made by the PACE Management Team regarding how to manage such Cols, for the purpose of internal governance processes. This record will be marked as confidential and treated as confidential information.

Final PACE Programme Decision Makers

Ultimately, the PACE management team itself will be the final decision maker on any proposals, taking fully into account the scoring and recommendations of the reviewers. The same process of identifying and recording Cols as above shall apply to the final PACE programme decision makers.

It is acknowledged that there are situations where there might be an inherent PACE funding call-related Col for the final PACE programme decision makers. For example, an application includes MDC, LifeArc or IUK providing services as a part of the proposal. Another example would be where an applicant is a member of a SAB of Medicines Discovery Catapult, LifeArc or IUK. In such instances, the final PACE management team decision makers shall not take any benefit to such organisation into account (either positively or negatively) when making their decisions.

Document Control

This document will be reviewed every 5 years or when required through operational necessity.