

CONFLICTS OF INTEREST POLICY EXPERT REVIEWS

Oracle Head & Neck Cancer UK

Policy governing conflicts of interest for Trustees, staff, Research & Funding Committee members and external reviewers involved in the assessment and award of research funding

1. Purpose & Scope

Oracle HNC's credibility depends on funding decisions being made purely on scientific merit, strategic fit, and patient benefit — never on personal relationships, financial interest, or institutional convenience.

This policy governs how conflicts of interest are identified, declared, and managed by everyone involved in assessing or deciding research grant applications: Trustees, Research Funding Committee members, external peer reviewers, and staff (including the Executive Director and senior staff, see Section 7).

It supplements — and does not replace — the charity's general Conflicts of Interest Policy, related-party transaction rules, gifts and hospitality policy, and Governing Document.

2. Definitions

- Conflict of interest: any personal, financial, or professional interest that could reasonably be seen to compromise an individual's objectivity in a funding decision, whether it actually does or not.
- Perceived conflict: one a reasonable, informed member of the public would see as capable of influencing a decision, regardless of the individual's own belief in their impartiality.
- Recusal: formal withdrawal from discussion, scoring, and decisions on a specific application.
- Close family member: spouse, partner, parent, child, sibling, or equivalent in-law/step-relationship
- Host institution: the organisation that would administer the grant.

- Register: the charity's Conflicts of Interest Register, maintained by the Research/Funding team.

3. Applicants, Co-Applicants and Collaborators

3.1 Principle

No one may review, score, discuss, or decide on an application where they are an applicant, co-applicant, collaborator, supervisor, or otherwise connected to the applicant or their institution. This applies equally regardless of seniority.

Before reviewing any application, the following **MUST be declared if applicable**:

- Being named on the application (or a linked application elsewhere) as applicant, co-applicant, collaborator, supervisor, or mentor;
- Affiliation (employed, honorary, visiting) with the applicant's host institution or department;
- Co-authorship, joint supervision, or joint grants with the applicant within the last five years;
- Being a current/recent line manager, mentee, or close collaborator;
- Any personal/family relationship (*see below*);
- Any business/financial interest (*see below*);
- A competing application in the same funding round;
- Any other interest a reasonable person might see as influencing judgement.

3.2 Personal relationships requiring declaration include spouses/partners, close family, cohabitants, close friendships beyond ordinary professional acquaintance, and past relationships that could affect impartiality either way. When in doubt, disclose and let the Chair decide.

3.3 Financial/business interests requiring declaration (including those of a spouse/partner or close family member) include: equity in the applicant's employer/sponsor; directorships, consultancies, or advisory roles with the applicant's institution; fees or funding received from the applicant or their institution; overlapping patents/IP; a spin-out or venture that could benefit from the research; or any arrangement that could create an incentive to favour the application. This covers

current, recent (3–5 years), or reasonably anticipated interests (e.g., a pending job offer).

3.4 Timing

Any conflict, or potential conflict, of interests must be declared at invitation to review (before receiving materials), again at the start of each meeting for each agenda item, and immediately if a conflict arises later. All declarations will be recorded in the Register.

3.5 Managing conflicts

1. The conflicted individual receives no application materials.
2. They leave the meeting for that item (may briefly answer factual questions only).
3. Independent review/scoring still proceeds in full, sourcing another reviewer if needed.
4. A conflicted Chair is replaced by the Deputy Chair or another Trustee for that item.
5. The Research/Grants team documents the conflict, recusal, and independent assessment.

3.6 Additional considerations

In small specialist fields, the least-conflicted available reviewer may be used if no unconflicted option exists, provided the connection is disclosed and their score isn't relied on alone. Patient/lay reviewers must also declare relevant personal connections. Interests must be re-declared at each funding round. Consideration will be given to whether funding would disproportionately benefit a reviewer's own institution (e.g., via overheads) even without personal financial gain.

3.7 Failure to declare is a serious breach and may lead to the decision being paused or reversed, referral to the Chair of Trustees or a regulator, and removal from the panel or reviewer pool.

3.8 Ongoing duty

Declaration obligations continue for the life of the grant, e.g., if someone joins a funded project as a collaborator later, this must be declared and reassessed.

4. Co-Authorship Conflicts

Co-authorship is assessed separately because it is objectively verifiable but varies widely in what it indicates about closeness of relationship.

4.1 Conflicts that must be declared

Co-authored publications, chapters, guidelines, or reviews with the applicant within the last five years; manuscripts in preparation or under review together; a pattern of repeated co-authorship even if the most recent instance is older; any doctoral/postdoctoral supervisory relationship (regardless of when or whether it produced a joint publication); and co-authorship within a small, closely-working group as opposed to a large consortium.

4.2 Distinguishing substantive from consortium authorship

Consideration will be given to author-list size and relative position, whether the work involved direct collaboration or independent contributions to a shared large-scale output, whether it was one-off or sustained, and the likelihood of future collaboration. When in doubt, disclose and let the Chair decide.

4.3 Managing conflicts (graduated)

- Recent, frequent, or substantive co-authorship → recuse (per Section 3.5).
- A single, distant co-authorship with no ongoing relationship → disclose to the Chair, who decides whether recusal or disclosure-only is sufficient.
- Large consortium/multi-centre authorship with no direct working relationship → disclosure is good practice; recusal not normally required.
- The reasoning behind whichever outcome applies must be recorded in the Register.

4.4 Supervisory relationships (doctoral/postdoctoral, either direction) always require recusal, regardless of timing or publication history.

Declarations must be refreshed each funding round. Failure to declare a substantive co-authorship conflict is handled as described in Section 3.7.

5. Direct Competitors

A reviewer is a direct competitor where they are working on substantially the same question as the applicant, have an overlapping application pending, compete for the same patient cohort/dataset, hold competing IP or technology, could see their own standing or funding affected by the outcome, or have a recent priority dispute or public disagreement with the applicant. Competing interests can bias scoring either unfairly low (a rival) or unfairly high (a shared interest in defending an approach or field).

5.1 Declaration

Individuals must declare competing status, or uncertainty about it, before reviewing; the Chair or Research/Funding team resolves doubtful cases.

5.2 Managing competitor conflicts

- The Research/Funding team screens panels against applicants' research areas and known competing programmes, in addition to self-declaration.
- Identified competitors recuse, per Section 3.5.
- Because top experts in narrow fields are often the applicant's closest competitors, the charity may commission additional external review.
- Close-but-non-recusal cases are disclosed to the full panel so comments can be weighed accordingly.
- The interest and action taken are recorded in the Register.

5.3 Not every scientific proximity is a competing interest Adjacent expertise is often valuable in reviewers. The test is whether the reviewer's own current or near-future work, funding, or standing could be materially affected by this specific application. Failure to declare is handled as under Section 3.7.

6. Institutional Conflicts of Interest

Institutional conflicts arise from the relationship between the charity (or affiliated institutions) and an applicant, independent of any individual's personal conflict, and can exist even when every individual involved is personally conflict-free.

6.1 Examples of Institutional Conflict might be:

A panel member's employer is the same as the applicant's; the charity has a funding partnership or MOU with the applicant's institution; the applicant's institution is a major recipient of the charity's funding overall; the charity has received donations or sponsorship from the applicant's institution; a staff member administering the process reports into the applicant's institution; the charity holds IP or commercial interests overlapping with the research; the charity's strategy was shaped in partnership with the applicant's group; or a Trustee/senior staff member sits on the board of a partner organisation that is itself an applicant or co-funder.

Institutional and individual conflicts are distinct and must be assessed separately; resolving one does not resolve the other.

6.2 Identification

The Research/Funding team maintains and annually updates a record of significant institutional relationships, screens applications against it each round, and requires panel members to declare affiliations at each meeting regardless of perceived materiality. Any institutional-level interest of the charity itself must be disclosed to the panel before discussion.

6.3 Managing institutional conflicts (one or more as appropriate):

- Full disclosure to the panel, recorded in the Register.
- Additional independent external review for applications tied to institutions with significant charity relationships.
- Recusal of institutionally-linked panel members, even without personal conflict.
- Separation of duties: those managing an institutional partnership should not also assess funding applications from that institution.
- Board-level oversight and ratification where the charity's own strategic or financial interests are involved, excluding conflicted Trustees.
- Periodic monitoring of award distribution by institution to catch unmanaged patterns.

6.4 Charity-employed/funded researchers

Applications from the charity's own staff or affiliated research units must go through the same independent external review as any other application, with no involvement from the charity's research leadership; an external decision-making body may be more appropriate given the heightened risk of perceived favouritism.

Unmanaged or repeated institutional conflicts are a governance matter, escalated to the Board and potentially disclosed in the annual governance statement. Significant institutional relationships should be reviewed at least annually.

7. Conflicts Involving the Executive Director and Senior Staff

Senior staff (Executive Director, etc.) influence funding calls, reviewer selection, and application framing even without formally scoring applications, making their conflicts less visible and harder to manage by simple recusal, and often a matter of Board accountability rather than personal choice.

7.1 The following must be declared (in addition to Sections 3–6)

Prior employment, consultancy, or board roles at an applicant's institution or connected company within a relevant period; board/advisory roles at organisations that are applicants, co-funders, or partners; personal, family, or business relationships with an applicant; any personal benefit from a funding decision; and any pending employment, consultancy, or board discussions with an applicant's institution.

The Executive Director declares to the Chair of Trustees; other senior staff declare to the Executive Director, who decides (with the Chair as needed) whether to escalate to the Board.

7.2 Managing Executive Director conflicts

Any conflicts must be disclosed to the Chair and recorded in the Board's register; the Executive Director must step back entirely from shortlisting, briefing, or presenting on the matter; the Chair or an unconflicted senior Trustee/staff member should take over the review; the Board should ratify any affected decision, excluding conflicted Trustees.

7.3 Managing other senior staff conflicts

The senior staff member must step back from screening, briefing, or presenting the application; the Executive Director will reassign the function to an unconflicted colleague; the conflict and action taken are recorded and reported to the Executive Director and, where material, the Board.

7.4 Future employment/roles

Any approach regarding future employment, consultancy, or board roles connected to a current or recent applicant must be declared immediately, with no involvement in decisions affecting that applicant until resolved.

Failure to declare is a serious governance matter, addressed under disciplinary procedures, potentially reported to the Board, and may result in the affected decision being reviewed or reversed.

8. Registers, Training, Reporting and Breach

- **Register:** the Research/Funding team maintains a central Register of all declarations and actions taken, shared with the Board at least annually and with panel Chairs before each meeting.
- **Training:** everyone involved in grant assessment receives this policy before participating and confirms in writing they've read and understood it, with reconfirmation at least every two years or after material revision.
- **Reporting concerns:** anyone aware of an undeclared or poorly managed conflict should raise it with the relevant Chair, the Executive Director, or (if it involves the Executive Director) the Chair of Trustees, or via the Whistleblowing Policy.
- **Breach:** depending on severity, may result in the affected decision being reviewed, suspended, or reversed; removal from the relevant panel or reviewer pool; referral to the Chair of Trustees or disciplinary process; or reporting to the Charity Commission or another regulator.

For any queries about this policy, email:

julie@oraclehnc.org.uk

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| Policy Owners | J Child & F Hieatt |
| Date Created | 24 June 2026 |
| Date Due for Review | 25 June 2027 |
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