

WESSEX MEDICAL TRUST (the "Charity")

CONFLICTS OF INTEREST POLICY

1 Definition and Meaning

A conflict of interest refers to a situation where a conflict arises for a person between competing interests or duties. Such refers to an actual or reasonably perceived or apparent conflict of interest.

2 Application of Policy

This Policy relates to the Trustees of the Charity, the Trust Director and the members of its Scientific Advisory Committee, including any external advisor thereof ("SAC") (collectively known as the "Relevant Individuals" or, individually, as a "Relevant Individual" or "Individual") in the context of:

- a) any funding application, bid or proposal made to the Charity; and/or
- b) any discussion or decision by the Charity thereon.

This Policy likewise applies, mutatis mutandis, to any operational or administrative activity of the Charity itself

3 Purpose

The purpose of this Policy is to minimise and manage the potential for conflicts of interest arising, and thus to afford certainty that the interests and affiliations of any of the Relevant Individuals do not interfere with the fulfilment of the Charity's objectives.

4 Declaration of interests

- a) All Relevant Individuals must declare any disclosable external interest on his or her appointment or immediately it arises (if subsequent to the date of appointment) and at least annually thereafter. Declarations should be made to the Trust Director or, in the case of an interest relating to the Trust Director, to the Chair of Trustees. An associated Register of Interests will be maintained by the Charity.
- b) Interests which must be disclosed by such Individuals include:
 - i. Direct equity interests in enterprises with involvement in pharmaceuticals, healthcare, biotech or related areas, or in any other enterprise that may have a real or perceived interest in the work of the Charity. Investments in collective vehicles such as Unit Trusts or Investment Trusts need not be included.
 - ii. Consultancies and other external appointments (paid and unpaid) in the above areas, together with details of any remuneration or other benefits arising from these.

AVOIDANCE OF CONFLICTS OF INTEREST IS KEY TO ETHICAL GOVERNANCE

- c) Each Relevant Individual must adhere to the spirit of this Policy and in so doing must declare any other interests which that Individual feels may be a source of conflict, or which might be perceived to conflict, with the interests or functions of the Charity.
- d) Each Relevant Individual must understand and accept that they are appointed as an Individual and not as a representative of any organisation by which they are employed or with which they have significant contracts.
- e) The requirement to disclose these interests also extends to any interests of a similar nature held by an Individual's spouse, civil or other partner or minor children. In the case of adult children, the Individual must declare any interests that they may hold to the extent that he or she is aware of them.
- f) The Charity will maintain a register of interests notified.

5 Discussion of funding applications, bids and proposals

- a) Details of applications for funding, meeting papers and related correspondence and the names of external referees are strictly confidential and must not be discussed with persons outside the relevant review process.
- b) Discussions of any such proposal between any Relevant Individual occurring outside a formal meeting convened for such a purpose should be declared to the Chair of Trustees or to the Chair of the SAC, as appropriate.
- c) No Relevant Individual may discuss Trustee or SAC deliberations on the peer review process directly with any applicant unless specifically requested by the appropriate Chair to do so.
- d) If a Relevant Individual is approached by an applicant for technical advice on an application then the Relevant Individual may provide such advice but must report such in writing to the relevant Chair, through the Trust Director, as soon as practicable and in any event before any decisions are made by the Charity on the application. The Relevant Individual may subsequently be asked by the relevant Chair to absent themselves from any discussion of the relevant discussion.
- e) If the advice sought by an applicant relates to administrative matters or is in order to seek information on the status of their proposal, the Relevant Individual should refer the applicant to the Trust Director.

6 Resolution of Conflicts of Interest

- a) The Charity recognises that the majority of conflicts arising will relate to a particular issue and as such will not present any long-term restrictions on an Individual's efficacy vis-à-vis the Charity.
- b) In an exceptional, but small, number of cases, major conflicts of interest may arise which seemingly compromise a Relevant Individual's status as such. In such a situation, the matter will be discussed by a sub-committee of the Charity comprising at least three current Trustees who are not otherwise directly involved with the matter. In cases where agreement or resolution cannot be reached through this means, the case will be referred to the Board of Trustees of the Charity, its determination being final.

AVOID CONFLICTS OF INTEREST WHENEVER YOU CAN

c) Relevant Individuals are required to declare any potential conflicts of interest relating to individual funding decisions to the relevant Chair before the meeting at which they are due to be discussed, or during the meeting as soon as the existence of a conflict becomes apparent. The Chair will then make a decision, having regard to the entirety of this Policy.

d) Automatic exclusion from participation in a funding decision:

An Individual will be automatically excluded from participation in a funding decision in cases where that Individual has a direct interest in the funding proposal under discussion. A direct interest applies, but is not limited to, any of the following situations:

- i. The Individual concerned is the sole applicant on the funding proposal.
- ii. The Individual concerned is an academic sponsor or supervisor of the applicant on the funding proposal.
- iii. The Individual is a joint applicant on the funding proposal.
- iv. A relative of the Individual is the sole or a joint applicant on the funding proposal. (For the purposes of this Policy “relative” includes, but is not limited to, a spouse - current or past - civil partner, children, siblings and parents.)
- v. An applicant on the funding proposal is a business partner of the Individual.

N.B. Where applicable, the Charity additionally requires Individuals internal to the University of Southampton fully to comply with the University’s own, and any current, conflicts of interest Policy.

Where an Individual is excluded from a funding decision on this basis, he or she must therefore absent themselves from the relevant meeting while the proposal concerned is being discussed. He or she should not receive the application itself or any related papers, including referee reports.

e) Exclusion at the Charity’s discretion:

In certain situations, an Individual may be excluded from discussion of a proposal at the discretion of the Charity. Examples of such situations include, but are not limited to:

- i. The Individual concerned can be seen as a direct competitor of the applicant; i.e. he or she is currently being funded, or is currently applying for funding, on a project of a similar nature to the proposal under discussion.
- ii. The Individual 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.
- iii. The Individual has scientifically, medically or academically collaborated or published with the applicant within the past three years.
- iv. The Individual 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.

DISCLOSE CONFLICTS OF INTEREST WHEN THEY OCCUR OR ARE PERCEIVABLE

In any of these cases, the particular situation will be discussed by the relevant Chair and the Trust Director, who will decide on one of the following options:

- i. The Individual is to be allowed to participate fully in the funding decision.
- ii. The Individual is to be allowed to discuss and vote on the proposal but may not present the proposal to the committee.
- iii. The Individual may be permitted to comment on the proposal but not take part in any funding decision.
- iv. The Individual is to absent himself or herself from the meeting while the proposal is being discussed.

If an agreement cannot be reached between the relevant Chair and the Trust Director, the Individual must absent himself or herself from proceedings while the proposal is being discussed.

f) Where uncertainty arises

- i. In any case where an Individual is uncertain as to whether a conflict of interest exists or not, he or she should report this to the relevant Chair who will discuss the matter with the Individual as necessary and make a decision having regard to the entirety of this Policy.
- ii. If an Individual is concerned about a possible conflict of interest involving another member of the Trustee Board or SAC, then he or she should raise the matter with the relevant Chair or Trust Director.

7 Updating the Policy

The Charity is to review this Policy every two years in consultation with its Board of Trustees.

UNDISCLOSED CONFLICTS OF INTEREST CAN HAVE NEGATIVE AND REPUTATIONAL CONSEQUENCES. IF IN DOUBT, CONSULT AND DISCLOSE