

Eczema UK Research Funding Conflict of Interest Policy

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Applies To

This Policy applies to all individuals involved in Eczema UK's research funding activities, including:

- Board of Trustees
- Chief Executive
- Eczema UK staff
- Grant Advisory Panel (GAP) members
- External expert reviewers
- Experts by Experience (EXEC) reviewers

- Applicants
- Independent advisers and consultants
- Any person participating in research funding decisions

Related Documents

This Policy should be read alongside:

- Research Funding Framework
- Research Funding Expert Review Policy
- Research Funding Terms and Conditions
- Grant Advisory Panel Terms of Reference
- Artificial Intelligence (AI) Policy for Research Funding

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1. Purpose

Eczema UK is committed to maintaining the highest standards of integrity, independence, transparency and fairness in the administration of its research funding programmes.

The purpose of this Policy is to establish a clear and proportionate framework for identifying, declaring and managing actual, potential and perceived conflicts of interest throughout Eczema UK's research funding activities. Effective management of conflicts of interest safeguards the integrity of funding decisions, promotes public confidence and ensures that charitable funds are allocated through a fair, transparent and independent process.

As an introductory member of the Association of Medical Research Charities (AMRC), Eczema UK is committed to applying AMRC's principles of expert review and recognised standards of research governance. Effective identification and management of conflicts of interest is fundamental to the AMRC principle of impartiality and to maintaining the independence and integrity of research funding decisions.

This Policy forms part of Eczema UK's wider Research Funding Framework and should be read alongside the Eczema UK Research Funding Expert Review Policy and associated governance documents.

2. Scope

This Policy applies to all research funding schemes administered by Eczema UK unless alternative arrangements are specified within the relevant funding call documentation or Award Letter.

It applies throughout the research funding lifecycle, including application, expert review, funding recommendations, Trustee approval and post-award decision-making where conflicts of interest may arise.

The Policy applies to all individuals involved in the administration, assessment, recommendation or approval of research funding applications, including:

- Board of Trustees;
- Chief Executive;
- Eczema UK staff;
- members of the Grant Advisory Panel (GAP);
- external expert reviewers;
- members of the Experts by Experience (EXEC) Group;
- applicants;
- independent advisers and consultants; and
- any other individual participating in Eczema UK's research funding activities.

All individuals covered by this Policy are responsible for identifying, declaring and appropriately managing any actual, potential or perceived conflicts of interest.

3. Definitions

For the purposes of this Policy:

Actual conflict of interest

A situation in which an individual's personal, professional or financial interests directly conflict with their responsibilities within Eczema UK's research funding process.

Potential conflict of interest

A situation in which an individual's interests could reasonably develop into an actual conflict of interest in the future.

Perceived conflict of interest

A situation in which an independent observer could reasonably conclude that an individual's impartiality may be compromised, regardless of whether an actual conflict exists.

Conflict of interest

Any actual, potential or perceived interest that could influence, or reasonably be perceived to influence, the independence, objectivity or impartiality of an individual participating in Eczema UK's research funding activities.

Research funding activity

Any activity associated with the administration, assessment, expert review, recommendation, approval or monitoring of research funding applications.

Participant

Any individual covered by this Policy.

4. Principles

The management of conflicts of interest within Eczema UK's research funding activities is founded on the following principles.

4.1 Independence

Research funding decisions must be made independently and free from actual, potential or perceived conflicts of interest. Individuals must not allow personal, professional or financial interests to influence, or reasonably be perceived to influence, their judgement or decision-making.

Effective management of conflicts of interest supports the AMRC principles of independence, impartiality, transparency and public confidence in research funding.

4.2 Integrity

All participants must act honestly, ethically and in the best interests of Eczema UK and the people affected by eczema. Funding decisions should be based solely on the published assessment criteria, independent expert judgement and the potential to advance eczema research and improve patient outcomes.

4.3 Transparency

Relevant interests must be declared openly, accurately and promptly. Eczema UK is committed to managing conflicts of interest in a transparent, consistent and proportionate manner, with appropriate records maintained to support accountability and good governance.

4.4 Fairness

All research funding applications must be assessed fairly, objectively and consistently. Conflicts of interest will be managed to ensure that every application receives an independent assessment using published criteria and recognised principles of peer review.

4.5 Accountability

Everyone involved in Eczema UK's research funding activities shares responsibility for protecting the integrity of the funding process. Individuals are responsible for declaring relevant interests and complying with conflict management measures, while Eczema UK is responsible for ensuring that conflicts are identified, assessed, managed and recorded appropriately.

4.6 Proportionality

Not every declared interest constitutes a material conflict of interest. Eczema UK will assess each declaration on its merits, considering the nature of the interest, its relevance to the funding activity, the level of risk presented and the potential impact on the integrity of the funding process. Management measures will be proportionate to the significance of the conflict.

4.7 Confidentiality

Information relating to declarations of interest, funding applications and expert review activities will be handled confidentially and in accordance with the Eczema UK Research Funding Expert Review Policy, data protection legislation and Eczema UK's information governance requirements. Participants must protect confidential information obtained

through their involvement in research funding activities and must not disclose or use such information for personal or professional advantage.

4.8 Public Trust

Eczema UK recognises that effective management of conflicts of interest is fundamental to maintaining the confidence of applicants, reviewers, people affected by eczema, donors, partners and the wider public. All participants share responsibility for protecting the integrity, independence and reputation of Eczema UK's research funding programme.

4.9 Continuous Improvement

Eczema UK is committed to reviewing and strengthening its conflict of interest arrangements to reflect evolving good practice, updates to Association of Medical Research Charities (AMRC) guidance, lessons learned from research funding rounds and developments within Eczema UK's Research Funding Framework.

5. Declaration of Interests

5.1 Duty to Declare

Everyone covered by this Policy has an individual responsibility to identify and declare any actual, potential or perceived conflicts of interest relating to Eczema UK's research funding activities.

Declarations must be made honestly, promptly and in sufficient detail to enable Eczema UK to determine whether any action is required to protect the integrity, independence and transparency of the research funding process.

Failure to declare a material conflict of interest may result in removal from the assessment process, withdrawal from current or future research funding activities, referral to the individual's employing institution where appropriate, or other proportionate action.

5.2 When Interests Must Be Declared

Declarations of interest must be made:

- upon appointment to a research funding role;
- before participating in each funding round or assessment process;
- before accepting an invitation to review an application or participate in a funding meeting;
- at the beginning of Grant Advisory Panel meetings and other meetings where funding decisions are considered;

- immediately if a new actual, potential or perceived conflict arises during the funding process; and
- whenever requested by Eczema UK.

Individuals are responsible for ensuring that their declarations remain accurate and up to date throughout their involvement in Eczema UK's research funding activities.

All external expert reviewers, GAP members and EXEC reviewers must formally acknowledge that they have read, understood and agree to comply with this Policy before participating in Eczema UK's expert review process.

GAP members shall make a written declaration of interests on appointment and at least annually thereafter, as well as declaring application-specific conflicts for each funding round and at relevant Panel meetings.

5.3 Interests Requiring Declaration

Participants must declare any interest that could reasonably be considered capable of influencing, or appearing to influence, their impartiality. Unless otherwise stated, "recent" means within the previous five years.

Relevant interests may include, but are not limited to:

Financial interests

- Employment or consultancy.
- Honoraria, speaker fees or advisory board membership.
- Research funding or commercial sponsorship.
- Shareholdings or other financial investments.
- Patents, licences, royalties or other intellectual property interests.

Institutional Interests

Participants must declare institutional interests that could reasonably be considered capable of influencing, or appearing to influence, their independence or impartiality. These may include, but are not limited to:

- employment by the same institution as an applicant or co-applicant;
- employment within the same department, faculty, school, research centre or institute;
- honorary academic or clinical appointments;

- visiting appointments, secondments or joint appointments;
- shared line management or reporting arrangements;
- institutional leadership or management responsibilities relevant to the application;
- significant institutional financial interests or commercial relationships relating to the proposed research;
- institutional partnerships, strategic collaborations or consortium arrangements that could reasonably be perceived to influence impartiality; and
- any other institutional connection that could reasonably give rise to an actual, potential or perceived conflict of interest.

Professional Interests

Participants must declare professional interests or relationships that could reasonably be considered capable of influencing, or appearing to influence, their independence or impartiality. These may include, but are not limited to:

- current or recent research collaborations;
- co-authorship of publications;
- joint grant applications, whether current or recent;
- regular co-investigator relationships;
- membership of the same research consortium, network or collaborative programme;
- supervisory, mentoring or line management relationships, whether current or recent;
- current or recent examiner or assessment relationships (where relevant);
- joint patent applications or shared intellectual property interests;
- significant publication collaborations beyond routine multi-author publications;
- significant academic competition, including direct competition for funding, publications or research leadership; and
- any other professional relationship that could reasonably be perceived as affecting independent judgement.

Personal Interests

Participants must declare personal relationships or circumstances that could reasonably be considered capable of influencing, or appearing to influence, their independence or impartiality. These may include:

- close family or personal relationships with an applicant or member of the research team;
- close friendships;
- significant personal disputes or antagonistic relationships;
- business partnerships or other significant personal associations; and
- any other personal relationship or circumstance that could reasonably be perceived as affecting independent judgement.

Other interests

Any other actual, potential or perceived interest that could reasonably undermine confidence in the independence, objectivity or fairness of the research funding process.

5.4 Register of Interests

Eczema UK will maintain a confidential Register of Interests for individuals covered by this Policy.

The Register will be used solely for the purpose of identifying and managing conflicts of interest within Eczema UK's research funding activities and will be maintained in accordance with applicable data protection legislation and Eczema UK's information governance policies.

The Register of Interests will be reviewed annually to ensure declarations remain current.

Access to the Register will be restricted to those responsible for administering and overseeing Eczema UK's research funding programme.

Eczema UK may publish summary information regarding governance arrangements and conflict management where appropriate in the interests of transparency.

6. Management of Conflicts of Interest

6.1 Principles of Conflict Management

Eczema UK is committed to managing conflicts of interest fairly, consistently and proportionately to safeguard the integrity, independence and transparency of its research funding activities.

All declared interests will be assessed on a case-by-case basis by Eczema UK, in consultation with the Chair of the Grant Advisory Panel where appropriate. In determining whether management action is required, Eczema UK will consider:

- whether the conflict is actual, potential or perceived;
- the nature and significance of the declared interest;
- its relevance to the research funding activity;
- the individual's role within the funding process;
- the stage of the funding process at which the conflict arises; and
- the potential impact on the integrity of the assessment process and public confidence in Eczema UK's research funding programme.

Eczema UK will seek to manage similar conflicts consistently across funding rounds while recognising that individual circumstances may require different management measures.

The declaration of an interest does not automatically prevent participation in Eczema UK's research funding activities. Management decisions will be proportionate to the level of risk presented by the conflict.

6.1.1 Responsibility for Conflict Management Decisions

Responsibility for determining the appropriate management of declared conflicts of interest shall reflect the role of the individual concerned and the need to ensure independence, impartiality and good governance throughout the research funding process.

Unless otherwise specified, Eczema UK staff are responsible for administering this Policy and coordinating the assessment of declared interests in consultation with the Chair of the Grant Advisory Panel (GAP), where appropriate.

Responsibility for determining and approving conflict management measures is normally allocated as follows:

Individual declaring the conflict	Decision-maker
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External expert reviewer or Experts by Experience (EXEC) reviewer	Eczema UK staff, in consultation with the Chair of the Grant Advisory Panel where appropriate
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Grant Advisory Panel member	Chair of the Grant Advisory Panel
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Chair of the Grant Advisory Panel	Vice-Chair of the Grant Advisory Panel or another appropriately appointed independent Panel member
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Individual declaring the conflict Decision-maker

Chief Executive

Chair of the Board of Trustees

Trustee

Chair of the Board of Trustees, or where the Chair has a conflict of interest, another unconflicted Trustee appointed in accordance with Eczema UK's governance arrangements

Where there is uncertainty regarding the existence or significance of a conflict of interest, or where the circumstances are particularly complex, Eczema UK may seek independent advice before determining the appropriate management action.

All conflict management decisions shall be recorded in accordance with this Policy and applied consistently, proportionately and transparently.

6.2 Management Measures

Where a conflict of interest is identified, Eczema UK may implement one or more of the following measures:

- determine that no further action is required where no material conflict exists;
- require the individual to observe but not participate in discussion;
- require the individual to abstain from scoring or recommending an application;
- exclude the individual from discussion or decision-making relating to a specific application;
- require the individual to withdraw from all or part of a meeting;
- require the individual to withdraw from receipt of confidential papers or information relating to a funding application;
- determine that the individual shall not be counted towards the quorum for a specific agenda item because of a declared conflict of interest;
- appoint an alternative reviewer or assessor;
- seek additional independent advice where appropriate; or
- implement any other proportionate measure considered necessary to protect the integrity and independence of the research funding process.

The management approach adopted will reflect the nature and significance of the conflict and the responsibilities of the individual concerned.

Where exclusion of one or more conflicted GAP members results in fewer than five unconflicted expert GAP members remaining eligible to consider an application, consideration and any funding recommendation relating to that application shall be

deferred until a quorate Panel can be convened in accordance with the Grant Advisory Panel Terms of Reference.

6.3 Management Throughout the Funding Process

Conflicts of interest will be actively managed throughout the research funding lifecycle and not solely at the point of declaration.

Where relevant, conflicts of interest will be considered during:

- reviewer selection and allocation;
- external expert review;
- Experts by Experience (EXEC) review;
- Grant Advisory Panel discussions and recommendations;
- Board of Trustee consideration of funding recommendations;
- post-award decisions where conflicts may arise; and
- any other activity associated with Eczema UK's research funding programmes.

Conflict management procedures will be implemented in accordance with this Policy and the Eczema UK Research Funding Expert Review Policy.

6.4 GAP Members Applying for Eczema UK Funding

Where a Grant Advisory Panel member is named on an application being considered by the Panel, whether as lead applicant, co-applicant, co-investigator, collaborator, supervisor or in another substantive capacity, that member shall take no part in the assessment of the application.

The member shall not receive reviewer reports or other confidential assessment material relating to the application beyond information available to the applicant, shall not score or discuss the application, shall withdraw from the meeting for the relevant item and shall not be counted towards the quorum for consideration of that application.

Where the Chair of the Grant Advisory Panel is named on an application being considered during a funding round, the Chair shall take no part in reviewer selection or allocation for that application and shall absent themselves from the Panel meeting for that funding round. The Vice-Chair, or another appropriately appointed unconflicted independent Panel member, shall assume the Chair's responsibilities for the affected funding round.

These arrangements apply regardless of the capacity in which the GAP member or Chair is named on the application.

6.5 Conflicts of Interest Involving Trustees

Given the Board of Trustees' ultimate responsibility for approving research funding recommendations, Eczema UK recognises the importance of ensuring that any actual, potential or perceived conflict of interest involving a Trustee is managed transparently and rigorously in accordance with the Charity Commission's guidance on trustee duties and conflicts of interest, the Charity's governing document, and this Policy.

A Trustee shall be considered to have a material conflict of interest where an application relates to, or could reasonably be perceived to relate to:

- the Trustee personally;
- the Trustee's employing or host institution;
- a current or recent research collaborator, supervisor, supervisee or close academic associate;
- a close family member or other personal relationship;
- an organisation in which the Trustee holds a governance, advisory or executive position;
- an organisation in which the Trustee has a material financial interest; or
- any other circumstance that could reasonably call into question the Trustee's independence or impartiality.

Where a material conflict of interest exists, the Trustee shall:

- declare the conflict as soon as it becomes apparent and before any discussion or consideration of the application;
- withdraw from all discussion and decision-making relating to the application;
- not score, rank or otherwise influence the assessment of the application;
- not vote on, or participate in, any recommendation or decision concerning the application;
- not be counted towards the quorum for that item of business;
- not receive papers, reviewer reports, scores, funding recommendations or other confidential information relating to the application beyond that which is strictly necessary to fulfil their statutory duties as Charity Trustees.

- not seek to influence Eczema UK staff, expert external reviewers, Experts by Experience (EXEC) reviewers, Grant Advisory Panel members or other Trustees regarding the application, whether formally or informally; and
- absent themselves from the meeting for the duration of the discussion and decision unless their presence is specifically requested solely to provide factual information, after which they shall withdraw immediately.

The Chair of the meeting shall ensure that the Trustee's withdrawal, the nature of the conflict and the actions taken are recorded in the minutes.

Where the Chair of the Board of Trustees has a conflict of interest, responsibility for managing the conflict and chairing the relevant item shall pass to an unconflicted Trustee appointed in accordance with Eczema UK's governance arrangements.

Where there is uncertainty as to whether a Trustee has a material conflict of interest, Eczema UK shall adopt a precautionary approach. The matter shall be determined by the Chair of the Board (or another unconflicted Trustee where the Chair has the conflict), taking account of this Policy, Eczema UK's governing document and applicable Charity Commission guidance. The reasons for the decision shall be documented.

Failure by a Trustee to declare or appropriately manage a conflict of interest may constitute a breach of Trustee duties and this Policy and will be managed in accordance with Eczema UK's governance procedures.

Where a Trustee is themselves an applicant for Eczema UK research funding, any proposed award must additionally comply with Eczema UK's governing document, applicable Charity Commission requirements and AMRC requirements relating to research funding awarded to charity Trustees.

6.6 Recording Conflict Management Decisions

Eczema UK will maintain appropriate records of:

- declarations of interest;
- conflict management decisions and the reasons for those decisions;
- withdrawals from discussions, scoring or decision-making;
- reviewer reassignments and other mitigation measures; and
- actions taken under this Policy.

Where conflicts of interest are considered during Grant Advisory Panel or Board of Trustees meetings, the official minutes shall record, as a minimum where applicable:

- the declaration of the conflict of interest;
- the nature of the conflict (at an appropriate level of detail);
- the management action taken;
- the individual's withdrawal from discussion and decision-making;
- the individual's return to the meeting following completion of the relevant agenda item (where applicable); and
- confirmation that the meeting remained quorate, or that quorum was re-established, for the consideration and decision of the affected agenda item.

The minutes should record the management of the conflict without including unnecessary confidential personal information.

Records will be retained in accordance with Eczema UK's records management, data protection and information governance policies and will support transparency, accountability, audit and continuous improvement.

7. Roles and Responsibilities

Everyone involved in Eczema UK's research funding activities shares responsibility for identifying, declaring and appropriately managing conflicts of interest. While responsibilities differ according to role, all participants are expected to uphold the principles set out in this Policy and contribute to a fair, transparent and independent research funding process.

7.1 Board of Trustees

The Board of Trustees is responsible for:

- approving this Policy and any subsequent revisions;
- ensuring appropriate governance arrangements are in place to manage conflicts of interest across Eczema UK's research funding programmes;
- declaring any actual, potential or perceived conflicts of interest before participating in funding decisions; and
- withdrawing from discussions or decisions where a conflict of interest exists.

The Board remains responsible for approving funding recommendations but does not participate in the independent scientific assessment of applications.

7.2 Chief Executive

The Chief Executive is responsible for:

- ensuring this Policy is implemented consistently;
- promoting compliance with Eczema UK's research governance framework;
- supporting appropriate management of conflicts of interest throughout the funding process; and
- referring significant governance issues to the Board of Trustees where appropriate.

The Chief Executive facilitates the research funding process but does not influence the independent scientific assessment of applications.

7.3 Eczema UK Staff

Eczema UK staff are responsible for administering conflict of interest procedures throughout the research funding process.

This includes:

- collecting declarations of interest;
- maintaining the Register of Interests;
- reviewing declarations before reviewer allocation in consultation with the Chair of the Grant Advisory Panel where appropriate;
- advising participants on the application of this Policy;
- implementing agreed conflict management measures;
- maintaining appropriate records; and
- reporting governance issues where necessary.

7.4 Chair of the Grant Advisory Panel

The Chair of the Grant Advisory Panel provides independent oversight of conflict of interest management during the expert review process, including in relation to the selection and allocation of external expert reviewers and the conduct of GAP meetings.

The Chair shall ensure that conflicted GAP members do not receive or participate in discussion, scoring or decision-making relating to affected applications and are not counted towards the quorum for those items.

The Chair is responsible for:

- supporting Eczema UK in reviewing declared interests where appropriate;

- ensuring conflicts of interest are appropriately managed during Panel meetings;
- requiring members with relevant conflicts to withdraw from discussion or decision-making where necessary; and
- declaring and managing their own conflicts of interest.

Where the Chair has a conflict of interest, responsibility will pass to the Vice-Chair or another appropriately appointed unconflicted independent Panel member.

7.5 Grant Advisory Panel Members

Grant Advisory Panel members must:

- declare all actual, potential or perceived conflicts of interest;
- review applications independently and objectively;
- comply with any conflict management measures implemented under this Policy;
- withdraw from discussions or scoring where required; and
- maintain confidentiality throughout the funding process.

7.6 External Expert Reviewers and Experts by Experience (EXEC) Reviewers

External expert reviewers and EXEC reviewers must:

- declare relevant conflicts of interest before accepting a review invitation;
- notify Eczema UK immediately if a conflict arises during the review process;
- decline or withdraw from reviewing where independence cannot be maintained;
- provide independent assessments within the scope of their role; and
- maintain the confidentiality of all application materials and discussions.

7.7 Applicants

Applicants are responsible for:

- declaring any actual, potential or perceived conflicts of interest relevant to their application;
- ensuring declarations are complete and accurate;
- notifying Eczema UK if relevant circumstances change during the funding process; and

- refraining from attempting to influence reviewers, Grant Advisory Panel members, Trustees or Eczema UK staff involved in funding decisions.

8. Confidentiality and Information Handling

8.1 Confidentiality

Maintaining confidentiality is essential to preserving the integrity, independence and credibility of Eczema UK's research funding programme.

Everyone participating in Eczema UK's research funding activities must treat all non-public information obtained through the funding process as confidential and use it solely for the purpose of fulfilling their responsibilities.

Confidential information includes, but is not limited to:

- research funding applications and supporting documentation;
- reviewer reports, scores and recommendations;
- Grant Advisory Panel papers and discussions;
- funding recommendations and decisions prior to announcement;
- declarations of interest and conflict management decisions; and
- any other non-public information obtained through participation in Eczema UK's research funding activities.

Individuals who withdraw because of a conflict must continue to maintain confidentiality regarding the application and associated discussions.

8.2 Use of Confidential Information

Individuals covered by this Policy must:

- maintain the confidentiality of all information obtained through the research funding process;
- use confidential information solely for the purpose for which it was provided;
- not disclose confidential information to any unauthorised person;
- not retain, copy or distribute confidential materials except where authorised by Eczema UK;
- not use confidential information for personal, professional or commercial advantage; and

- comply with any confidentiality agreements or non-disclosure agreements required by Eczema UK.

8.3 Information Security

Participants must take reasonable steps to protect confidential information from unauthorised access, disclosure, loss or misuse.

Confidential information must be stored, transmitted and disposed of securely in accordance with:

- UK data protection legislation;
- Eczema UK's information governance policies;
- the Eczema UK Research Funding Expert Review Policy; and
- any other relevant organisational policies and procedures.

8.4 Artificial Intelligence

Participants must comply with the Eczema UK **Artificial Intelligence (AI) Policy for Research Funding** when handling confidential information.

Confidential application materials, reviewer reports, declarations of interest and other non-public information must not be entered into publicly available generative artificial intelligence tools unless expressly authorised by Eczema UK and permitted under the AI Policy.

8.5 Data Protection

Eczema UK will process declarations of interest and associated personal information in accordance with applicable UK data protection legislation and Eczema UK's privacy and information governance policies.

Information will be collected and retained only for legitimate governance purposes associated with the administration of Eczema UK's research funding programme.

9. Reporting Concerns and Breaches

9.1 Reporting Concerns

Anyone involved in Eczema UK's research funding activities who becomes aware of an actual, potential or perceived conflict of interest that has not been declared, or who believes that a conflict has not been appropriately managed, must report the matter promptly.

Concerns should normally be raised with an appropriate member of Eczema UK staff or the Chair of the Grant Advisory Panel.

Where the concern relates to:

- **the Chair of the Grant Advisory Panel**, it should be referred to the Chief Executive;
- **the Chief Executive**, it should be referred to the Chair of the Board of Trustees; and
- **a Trustee**, it should be referred to the Chair of the Board of Trustees or another appropriately appointed Trustee.

Eczema UK is committed to fostering a culture of openness, transparency and integrity. Individuals who raise concerns in good faith will be treated fairly, respectfully and confidentially and will not be disadvantaged as a result of doing so.

9.2 Assessment of Concerns

All reported concerns will be considered promptly, fairly and confidentially.

The purpose of any assessment is to determine:

- whether an actual, potential or perceived conflict of interest exists;
- whether it has been appropriately declared and managed;
- whether additional conflict management measures are required; and
- whether any action is necessary to protect the integrity and independence of the research funding process.

Where appropriate, Eczema UK may:

- seek further information from the individual concerned;
- review declarations of interest and other relevant records;
- obtain independent advice;
- implement additional conflict management measures; or
- defer consideration of an application until the matter has been satisfactorily resolved.

Assessments will be proportionate to the nature of the concern and the potential impact on the fairness and credibility of the funding process.

9.3 Breaches of this Policy

Failure to comply with this Policy may undermine confidence in Eczema UK's research funding programme.

Examples of breaches include:

- failing to declare an actual, potential or perceived conflict of interest;
- providing incomplete, inaccurate or misleading declarations;
- participating in the assessment or decision-making process where a conflict has not been appropriately managed;
- failing to comply with agreed conflict management measures;
- improperly disclosing or using confidential information obtained through participation in the research funding process; or
- taking any action that compromises, or could reasonably be perceived to compromise, the integrity, independence or fairness of Eczema UK's research funding activities.

9.4 Management of Breaches

Where a breach of this Policy is identified, Eczema UK will determine an appropriate and proportionate response, taking account of:

- the nature and seriousness of the breach;
- whether it was deliberate or inadvertent;
- any actual or potential impact on the research funding process; and
- the need to maintain confidence in the integrity of Eczema UK's research funding programme.

Depending on the circumstances, Eczema UK may:

- require additional conflict management measures;
- withdraw an individual from discussion, assessment or decision-making;
- appoint an alternative reviewer or assessor;
- exclude an individual from current or future participation in Eczema UK's research funding activities;
- refer the matter to the individual's employing or host organisation where appropriate; or

- take any other action considered necessary to protect the integrity of the research funding process.

Where a breach may have materially affected a funding decision, Eczema UK reserves the right to review the assessment process and take any corrective action in accordance with its Research Funding Expert Review Policy.

10. Monitoring, Review and Continuous Improvement

10.1 Monitoring

Eczema UK will monitor the implementation and effectiveness of this Policy to ensure that conflicts of interest are identified, declared and managed consistently across all research funding activities.

Monitoring may include review of:

- declarations of interest and the Register of Interests;
- conflict management decisions;
- compliance with this Policy;
- feedback from applicants, reviewers, Grant Advisory Panel members and other participants;
- governance issues arising during funding rounds; and
- lessons identified from research funding activities.

Eczema UK will periodically review the proportion of Grant Advisory Panel members who are current recipients of Eczema UK research funding, together with the proportion of the charity's research funding portfolio represented by awards held by Panel members, to ensure that the Panel retains an appropriate level of independence and breadth of perspective.

Where appropriate, findings will be used to strengthen Eczema UK's research governance arrangements and support continuous improvement across its research funding programmes.

10.2 Policy Review

This Policy will normally be reviewed every three years, or earlier where required, to reflect:

- changes in legislation or regulatory requirements;
- updates to Association of Medical Research Charities (AMRC) guidance or other recognised standards of good practice;

- revisions to Eczema UK's Research Funding Framework;
- recommendations arising from governance reviews, audits or risk assessments;
- lessons learned from research funding rounds; or
- any other circumstances requiring amendment.

The Board of Trustees is responsible for approving this Policy and any subsequent revisions.

10.3 Relationship to Other Research Funding Policies

The Expect Review Policy describes *how* applications are assessed; this Policy governs *who may participate* in those assessments and under what circumstances.

This Policy forms part of Eczema UK's **Research Funding Framework** and should be read alongside the:

- Research Funding Expert Review Policy;
- Research Funding Terms and Conditions;
- Grant Advisory Panel Terms of Reference;
- Artificial Intelligence (AI) Policy for Research Funding; and
- other research governance documents approved by Eczema UK from time to time.

These documents are intended to operate as a complementary governance framework. Where there is any apparent overlap, they should be interpreted consistently to support the fair, transparent, independent and accountable administration of Eczema UK's research funding programmes. The Research Funding Expert Review Policy describes the operation of the expert review process, while this Policy establishes the principles and procedures for identifying, declaring and managing conflicts of interest throughout that process.

Appendix A – Conflict of Interest Declaration Form

Eczema UK Research Funding Conflict of Interest Declaration

This declaration must be completed by all individuals participating in Eczema UK's research funding activities in accordance with the **Eczema UK Research Funding Conflict of Interest Policy**.

Completed declarations will be held securely by Eczema UK and used solely for the purpose of identifying and managing conflicts of interest.

Section 1 – Personal Details

Name

Role ☐ Trustee ☐ Chief Executive ☐ Eczema UK Staff ☐ Grant Advisory Panel ☐ External Expert Reviewer ☐ Experts by Experience (EXEC) Reviewer ☐ Applicant ☐ Independent Adviser ☐ Other

Organisation

Email Address

**Funding Round /
Scheme**

**Application(s) (if
applicable)**

Date

Section 2 – Declaration of Interests

Please declare any **actual, potential or perceived** interests that could reasonably be considered capable of influencing, or appearing to influence, your independence, objectivity or impartiality in relation to Eczema UK's research funding activities.

This may include, but is not limited to:

Financial Interests

- Employment
- Consultancy
- Honoraria
- Advisory board membership
- Shareholdings
- Research funding
- Patents
- Intellectual property

- Commercial interests

Professional Interests

- Current or recent research collaborations
- Co-authorship
- Joint grant applications
- Supervisory or mentoring relationships
- Membership of the same research team or consortium
- Significant academic competition

Institutional Interests

- Employment by the same institution
- Departmental relationships
- Institutional financial interests
- Other institutional connections

Personal Interests

- Family relationships
- Close friendships
- Personal disputes
- Business partnerships
- Other relationships that could reasonably be perceived as affecting impartiality

Other Interests

Please declare any other actual, potential or perceived interests not covered above.

Declaration

☐ I have no actual, potential or perceived conflicts of interest to declare.

OR

☐ I declare the following interests:

Interest

Details

(Continue on a separate sheet if required.)

Section 3 – Changes to Circumstances

I understand that I have an ongoing responsibility to notify Eczema UK promptly if:

- my circumstances change;
- a new conflict of interest arises; or
- I become aware of any conflict that I have not previously declared.

Section 4 – Declaration and Agreement

I declare that:

- the information provided in this declaration is complete and accurate to the best of my knowledge;
- I have read and understood the Eczema UK Research Funding Conflict of Interest Policy and agree to comply with its requirements;
- I will comply with any conflict management measures determined by Eczema UK;
- I will maintain the confidentiality of all information obtained through my involvement in Eczema UK's research funding activities;
- I will notify Eczema UK promptly if my declaration changes at any time during my involvement in the research funding process.
- I have read the Eczema UK Confidentiality requirements.
- I agree not to use generative AI contrary to the AI Policy.

Name

Signature

Date

For Eczema UK Use Only

Declaration reviewed by

Date reviewed

Conflict identified? ☐ Yes ☐ No

Management action required? ☐ Yes ☐ No

Summary of management decision

Date participant notified

Review completed by