



BI-HR-008 CONFLICTS OF INTEREST POLICY

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Version control

Date	Version	Status	Summary of Changes
16 January 2020	1.0	Archive	New in the 2020 Policy Review
21 September	1.1	Active	Changes to the definition of Individuals; revision to Individuals considered under section 4 and minor amendments made to clarify wording in 2021 Policy Review

Document approval

Define the approval authorities for the document

Document version:	Document approved by:	Position:	Date:
1.0	Babraham Executive Committee	N/A	16 January 2020
1.1	Danielle Hoyle	Head of Research Operations	20 September 2021

Distribution

Name or Group	Date of issue	Version
All staff and associates	18 January 2021	1.0
All staff and associates	12 October 2021	1.1

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
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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.

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](#)⁵.
- 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 [REDACTED] already participating in such research.
- 11.4. All investigators must disclose any Significant Financial Interest (SFI) with respect to their Institutional Responsibilities (defined on the website) to the Institute Director who will determine whether such interest constitutes a Financial Conflict of Interest (FCOI). Note, that any SFIs and FCOIs identified would usually constitute a conflict of interest for the Institute and should therefore also be reported through the Institute's Declaration of Interests [REDACTED]
- 11.5. Where an SFI is determined to be an FCOI, a management plan will be drawn up by the investigator, the Institute Director and Grants Office to help manage, reduce or eliminate the FCOI.
- 11.6. A disclosure of the FCOI and the management plan must be submitted to the PHS-funder by the Grants Office.
- 11.7. Adherence to the management plan must be monitored. The Grants Office holds this responsibility.
- 11.8. All PHS-funded investigators are required to complete the training on financial conflict of interest available [here](#)⁶. Please inform the Grants Office when MC /P53.98 t Please inform the Grants Office v

11.10.