



Policy covers:	Conflicts of interest
Relevant to:	Applicants, reviewers, and grant holders
What is this?	This policy explains how we identify, assess, and manage conflicts of interest in research funding. It helps ensure decisions are fair, transparent, and based on objective judgement.
Key points:	<ul style="list-style-type: none"> • You must declare any actual, potential, or perceived conflicts of interest • Conflicts may include personal, professional, or financial relationships • NICHHS reviews all declarations and decides how they are managed • We distinguish between “hard” (unacceptable) and “soft” (manageable) conflicts • Conflicts are recorded and managed to protect the integrity of the process
Last updated:	April 2026
Review cycle:	Annual
Applies from:	Updates apply to current and ongoing awards unless stated otherwise

Conflict of Interest Policy

General

This policy covers NICHHS research funding committees and panels, and their members. It also covers any groups or individuals who are involved in the grants process, including those involved ad hoc. These shall be referred to as “Members” for the remainder of this document.

This policy also covers anyone who reviews applications as part of the grants process. These shall be referred to as “Reviewers” for the remainder of this document.

The purpose of this document is to minimise the potential for conflicts of interest arising from the grants process, and to protect NICHHS and those who work with us from any perception, real or otherwise, that the external interests and affiliations have interfered with their objectivity when involved with the grants process.

What is a conflict of interest?

Conflicts may be actual, potential, or perceived, and all should be declared where they could reasonably be seen to influence decision-making or the conduct of research.

A conflict of interest (COI) exists when an individual’s personal and/or professional interests or loyalties may affect their objectivity. This means their interests affect the fairness of the judgement they make.

A perceived conflict of interest exists when it could be reasonably considered by a third party that a conflict exists. This irrespective of whether this is the case.

Declaration of interest

Members must declare any disclosable external interests on appointment, and annually thereafter (specific to SRC). One-off or ad hoc members must also declare interests. To this end, Members must complete a registration of interest form. A register of interests will be kept up to date by the charity. NICHHS maintains this register as part of its governance and assurance processes.

NICHHS will use this register as part of its governance and assurance processes to identify, review, and manage potential conflicts of interest.

Members should also declare any other interests which they feel may be a source of conflict, or which might be perceived to conflict, with the wider interests of the charity. This includes interests held by members' immediate family. For purposes of clarity, "family" includes partners, friends, and other personal relationships.

Reviewing applications: Members and reviewers

We appreciate that Northern Ireland's research community is small and that this increases the chances of perceived conflicts. As such, we will judge declarations on a case-by-case approach. As a rule of thumb, and reflective of best practice, we identify two types of conflict: hard and soft. NICHHS Research Department staff and/or SRC will assess declared conflicts and determine how they are managed, including whether they require restriction, monitoring, or withdrawal from review or decision-making.

A hard conflict typically exists when:

1. A Member or Reviewer has a direct, personal conflict of interest, e.g. if the principal applicant or a co applicant is considered "family", or if there are other circumstances that prevent them giving an impartial view of the application.
2. A Member's own application is being discussed.
3. A Member is named as a co-applicant, collaborator, or named on the application.
4. A Member or Reviewer is from the same team / department as the principal applicant or a co-applicant.
5. A Member or Reviewer is currently working with principal applicant or a co-applicant on a project.
6. A Member or Reviewer is a supervisor of with principal applicant or a co-applicant.

A soft conflict (specific to SRC) typically exists when:

1. A Member or Reviewer is from the same institution, but a different department (or equivalent for institutions without a departmental structure) as the primary applicant or a co-applicant.
2. A member or Reviewer has been involved in the application, typically providing advice, but is not named on application.
3. A Member or Reviewer, whilst no longer working with principal applicant or a co-applicant, has worked with them in the last two years.
4. A Member or Reviewer supervised a principal applicant or a co-applicant in the last two years.

Whether a conflict exists, and whether it is hard or soft, will be determined by NICHHS Research Department staff and/or SRC, as appropriate.

In making this decision, NICHHS will consider the nature, timing, and closeness of the relationship, and whether it could reasonably be seen to affect objectivity.

Discussion of proposals

- Details of applications, meeting papers, related correspondence, are strictly confidential and should not be discussed with persons outside the review process.
- When handling materials, all members and reviewers are expected to adhere to NICHS data handling policies.
- Where Members have retired from discussion due to conflicts, other members must not inform / discuss Committee decisions with these members. Formal feedback is provided to all applicants, based on minutes of discussion and agreed feedback. It is not appropriate for individual members to feedback to Member applicants, unless asked to do so by the Chair and/or vice-chairs.
- Discussions of a proposal between Members of SRC, which occurs outside a committee meeting, should be declared to the Chair.
- If a Member is approached by an applicant for technical advice on an application, he or she may provide advice, but this must be declared in advance of decision making processes.

Managing conflicts of interests

- Where a Member has a hard conflict, they must declare an interest and withdraw from any consideration of that application. That Member will not receive documents pertaining to the application. They must retire from the meeting when the application is discussed.
- Members who could be seen as a direct competitor of the applicant (e.g. they are funded or applying for funding on a similar project to the proposal under discussion), or have collaborated closely, or published directly with the applicant within the past three years, should declare an interest and may be asked to retire from the meeting when the application is discussed.
- The Chair of SRC cannot be named on applications as principal applicant or a co-applicant.
- Where Chair is in conflict, they will retire from discussions of the relevant application(s). One of the two vice-Chairs will chair the discussion.
- All conflicts will be reviewed by NICHS staff in advance of any meeting. As a result, in the scenario where Chair and both vice-Chairs are in conflict, alternative arrangements will be made and agreed with SRC as to who will chair discussion.
- Where a Reviewer has a hard conflict, their offer of review will be declined - they will therefore withdraw from the process. Reviewers must not assess or score an application where a hard conflict exists.
- Where a Member has a soft conflict, decision as to whether they can formally review and score applications will be made by group consensus. If it is decided that they cannot formally score an application, they can still receive documents pertaining to the application and can contribute to the discussion, if agreed by consensus.
- Reviewers must not assess or score an application where a hard conflict exists.
- Where a Member has a soft conflict, decision as to whether they can formally review and score applications will be made by group consensus. If it is decided that they cannot formally score an application, they can still receive documents pertaining to the application and can contribute to the discussion, if agreed by consensus.
- Where a Reviewer has a soft conflict, NICHS Research Department staff will determine whether they can formally review and score an application. Where necessary and within the terms of this policy, NICHS staff can seek advice from SRC.
- NICHS will determine, on a case-by-case basis, whether conflicts can be managed (e.g. through declaration and restricted participation) or require exclusion from review or decision-making.

Resolution of conflicts of interest

- NICHHS recognises that most conflicts or potential conflicts will relate to a particular issue and as such will not present any long-term restrictions on an individual's ability to be involved in the grants process.
- NICHHS also recognises that Northern Ireland's research community is small and that this increases the chances of perceived conflicts. As such, we will judge declarations on a case-by-case approach. In cases where an individual is uncertain as to whether a conflict of interest exists or not, they should report this to NICHHS for a decision to be made, in consultation with the SRC chair and/or vice-chairs if appropriate.
- In a small number of cases, major conflicts of interest may arise which compromise an individual's ability to continue in their position. Where this occurs, NICHHS will discuss the matter with the individual and SRC chair and/or vice-chairs. A final decision regarding continued involvement / membership will then be made.
- Reviewers are expected to declare potential conflicts of interest relating to applications they are asked to review in advance of review and scoring. NICHHS staff will be forwarded relevant forms in advance of review to facilitate this.
- If an individual is concerned about a possible conflict of interest involving another member, then they should raise the matter with NICHHS before the meeting or to SRC chair during the meeting as soon as the possible conflict becomes apparent.
- All declared conflicts and outcomes of any decisions made will be documented as part of NICHHS governance processes.
- Declared conflicts and the outcomes of decisions made under this policy will be recorded as part of NICHHS governance processes.

Staff members

- We expect anyone involved in the processing or assessment of an application and those observing the meeting, to identify any real or perceived conflict of interest they have related to the applicants and institutions named in the application. NICHHS will discuss the matter with the individual and decide whether they should withdraw from any consideration of that application.
- NICHHS staff members involved decision making process (e.g. SLT) to complete a conflict of interest declaration form. If in conflict, they will retire from discussions of relevant application(s).