

RSO Conflict of Interest Policy

Purpose

The Nuclear Waste Services (NWS) Research Support Office (RSO) recognises that academics and other interested parties working with the RSO have diverse interests and contacts within the local, national and international community. Links between academics that work within the RSO and funders (including NWS), policy makers and other public bodies are fundamental and beneficial to the running of the RSO. However, the RSO recognises that such connections and working practices may give rise to potential conflicts of interest.

This conflict of interest policy aims to set out the roles, responsibilities and arrangements for identifying, managing and monitoring conflicts of interests. The National Audit Office (NAO) cross-governments Conflicts of Interest report, published in 2015, has informed much of this policy document development. The policy has been reviewed by the RSO Core Team, and will be presented to the RSO Strategy Board for endorsement.

What is a conflict of interest?

Conflict of interest: A conflict of interest is a set of circumstances that creates a risk that an individual's ability to apply judgement or act in one role is, or could be, impaired or influenced by a secondary interest. It can occur in any situation where an individual or organisation (private or government) can exploit a professional or official role for personal or other benefit. This definition is based on generally accepted standards.

For the purpose of this policy the term conflict of interest encompasses actual, perceived, or potential conflicts of interest.

Actual – a direct benefit, financial or otherwise, to the individual or to a relative or friend of the individual.

Perceived – a situation whereby a reasonable person would consider it likely that an actual conflict of interest would occur, regardless of whether there is an actual or potential conflict of interest.

Potential – a situation that could develop into an actual or perceived conflict of interest.

Procedure

Individuals working with the RSO are responsible for identifying and declaring any conflict of interest as they arise. The types of conflicts that may arise for specific roles within the RSO, and the reporting expectations for people within those roles, are indicated in table 1 below.

Members of the Core Team, the Discipline Leads and the NWS Subject Matter Experts must declare annually, when prompted, any personal

and professional interests that may compromise, or might be reasonably assumed to compromise, impartiality or lead to a private benefit. Where there are no conflicts identified we will ask for a null return. The annual declaration will coincide with the Strategy Board meetings.

The RSO project manager will maintain a register of interests. This will be updated following the annual declaration by all RSO staff, and ad hoc following additional declarations as they arise. This Col policy, but not the declaration, will be available on the RSO website.

Table 1, potential conflicts arising within specific roles in the RSO

Role	Situations where conflicts may arise	Potential conflict	Example mitigation	Reporting requirements
Core Team	Discipline lead recruitment	Knowledge of person applying	Not participating in evaluating applications or any interview stage if required	Annually report to register of interests informing of personal and professional interests that may result in a conflict of interest Declare specific interests ad hoc as they arise, i.e. with respect to specific funding calls or meetings
Core Team	Developing call briefs in area of expertise	Individual or person of interest may wish to apply for this funding	NWS lead scope; brief viewed and approved by multiple people. Individual not working on scope where there is a clear conflict.	Annually report to register of interests informing of personal and professional interests that may result in a conflict of interest Declare specific interests ad hoc as they arise, i.e. with respect to specific funding calls or meetings
Core Team	Strategic decisions about RSO priorities for funding calls	The research priorities may be funding that the individual/an individual of interest might apply for	Strategy board and NWS SMEs heavily involved and often lead in decision making for priority areas	Annually report to register of interests informing of personal and professional interests that may result in a conflict of interest Declare specific interests ad hoc as they arise, i.e. with respect to specific funding calls or meetings
Core Team	Discussions with external funding bodies re partnerships	Influence on funding priorities in their/someone of interests area of expertise	Decisions on funding areas involve multiple people and are led by the strategic priorities of NWS	Annually report to register of interests informing of personal and professional interests that may result in a conflict of interest

Role	Situations where conflicts may arise	Potential conflict	Example mitigation	Reporting requirements
				Declare specific interests ad hoc as they arise, i.e. with respect to specific funding calls or meetings
Core Team	Additional roles in external organisations	Influence on funding areas	Decisions on funding areas involve multiple people and are led by the strategic priorities of NWS	<p>Annually report to register of interests informing of personal and professional interests that may result in a conflict of interest</p> <p>Declare specific interests ad hoc as they arise, i.e. with respect to specific funding calls or meetings</p>
Core Team	Applying for funding from NWS	Influence on the competition or evaluation process	All funding is competed and evaluation completed by NWS with RSO involvement only upon request and in a case where there is no Conflict of Interest	<p>Annually report to register of interests informing of personal and professional interests that may result in a conflict of interest</p> <p>Declare specific interests ad hoc as they arise, i.e. with respect to specific funding calls or meetings</p>
Discipline lead	Developing call briefs	Individual or person of interest may wish to apply for this funding	NWS lead scope; Core team member can work in place of DL.	<p>Annually report to register of interests informing of personal and professional interests that may result in a conflict of interest</p> <p>Declare specific interests ad hoc as they arise, i.e. with respect to specific funding calls or meetings</p>
Discipline lead	Applying for funding from NWS	Influence on the competition or evaluation process	All funding is competed and evaluation completed by NWS with RSO involvement only upon request and in a case where there is no Conflict of Interest	<p>Annually report to register of interests informing of personal and professional interests that may result in a conflict of interest</p> <p>Declare specific interests ad hoc as they arise, i.e. with respect to specific funding calls or meetings</p>

Role	Situations where conflicts may arise	Potential conflict	Example mitigation	Reporting requirements
NWS SME	Developing call briefs	SME may have a relative or friend with expertise in the topic area that would apply for the funding	Technical briefs are developed and signed off by multiple people, including the RSO core team	Annually report to register of interests informing of personal and professional interests that may result in a conflict of interest Declare specific interests ad hoc as they arise, i.e. with respect to specific funding calls or meetings
NWS SME	Reviewing applications for funding	Knowledge of applicant	Change panel members and/or ensure multiple people confirm decision. Decisions led by NWS	Annually report to register of interests informing of personal and professional interests that may result in a conflict of interest Declare specific interests ad hoc as they arise, i.e. with respect to specific funding calls or meetings
PI on a project funded by NWS	Recruiting researchers / students	Recruiting a relative or friend	Jobs and studentships are advertised. Researchers will be required to comply with institution Col policy	No annual requirement to report Declare specific interests ad hoc as they arise.
Researcher on a project funded by NWS	No clear potential for conflict	NA	NA	No annual requirement to report Declare specific interests ad hoc should they arise
Funding body representative	Input in strategic funding direction decisions i.e. at Strategy board or specific meetings	Influence on funding priorities in someone of interests area of expertise	Decisions on funding areas involve multiple people and are led by the strategic priorities of NWS in collaboration with externals (UKRI etc.)	No annual requirement to report Declare specific interests ad hoc as they arise.

Table 2, example of register of interests

Nuclear Waste Services Research Support Office

Date	Individual	Role	Meeting, event or piece of work	Details of Col	Mitigation action taken	Follow up required	Date resolved
DD/MM/YYYY	J Blogs	Discipline lead	Microbiology project funding call development	Individual plans to apply for this funding call and has been asked to offer input as the DL	Member of CT supports SME with development of brief in place of the conflicted DL. Funding is competed and evaluation is completed by NWS	CT reviews completed brief to ensure no perceived advantage. Call is advertised openly and transparently to whole research community.	DD/MM/YYYY
DD/MM/YYYY	A Person	Core Team	Discipline lead recruitment	Individual is a colleague of an applicant to the DL role	CT member is not involved in the review of the DL, an alternative appropriate person is asked to take part in the evaluation	None	DD/MM/YYYY
DD/MM/YYYY	Hugh Man	Funding body representative	Strategy Board	Individual represents a funding body that could have an interest in strategic funding direction of NWS	Individual attends only as an observer	None	DD/MM/YYYY
DD/MM/YYYY	P Investigator	Discipline lead	Bursary call	Individual is applying for funding from the bursary call	All funding is competed and evaluation completed by NWS with RSO involvement only upon request and in a case where there is no Conflict of Interest	None	DD/MM/YYYY