

Anusandhan National Research Foundation
(Statutory Body Created by an Act of Parliament)

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Policy on Conflict of Interest

**For Grant Applicants (Including Collaborators), Reviewers, Committee Members and Officers
Dealing with Various Programs/ Schemes of ANRF**

Issues of Conflicts of Interest and ethics in scientific research and research management have assumed greater prominence, given the larger share of Government funding in the country's R & D scenario. The following policy pertaining to general aspects of Conflicts of Interest and code of ethics, are objective measures that is intended to protect the integrity of the decision-making processes and minimize biasness. The policy aims to sustain transparency, increase accountability in funding mechanisms and provide assurance to the general public that processes followed in award of grants are fair and non- discriminatory.

Definition of Conflict of Interest

Conflict of Interest means "any interest which could significantly prejudice an individual's objectivity in the decision-making process, thereby creating an unfair competitive advantage for the individual or to the organization which he/she represents". The Conflict of Interest also encompasses situations where an individual, in contravention to the accepted norms and ethics, could exploit his/her obligatory duties for personal benefits.

1. Coverage of the Policy

- a) The policy shall be binding on persons applying for and receiving funding from ANRF, Reviewers of the proposal and Members of Expert Committees, Programme Advisory Committees and other relevant committees of ANRF. The policy is also binding on all individuals including Officers of ANRF and Committees involved in evaluation of proposals and subsequent decision-making process.
- b) This policy aims to minimize aspects that may constitute actual Conflict of Interests, apparent Conflict of Interests and potential Conflict of Interests in the funding mechanisms that are presently being operated by ANRF. The policy also aims to cover, although not limited to, Conflict of interests that are Financial (gains from the outcomes of the proposal or award), Personal (association of Family members) and Institutional (Colleagues, Collaborators, Employer, persons associated in a professional career of an individual such as Ph.D. supervisor etc.).

2. Specifications as to what constitutes Conflict of Interest

Any of the following specifications (non-exhaustive list) imply Conflict of Interest if,

- (i) Due to any reason by which the Reviewer/Committee Member cannot deliver fair and objective assessment of the proposal.
- (ii) The applicant is a relative or family member (including but not limited to spouse, child, sibling, parent) or personal friend of the individual involved in the decision-making process
- (iii) The applicant for the grant is an employee or employer of an individual involved in the process as a Reviewer or Committee Member; or if the applicant to the grant/award has had an employer-employee relationship in the past five years with that individual.

- (iv) The applicant to the grant/award belongs to the same Department as that of the Reviewer/Committee Member.
- (v) The Reviewer/Committee Member is a Head of an Organization from where the applicant is employed.
- (vi) The Reviewer /Committee Member is or was, associated in the professional career of the applicant (such as Ph.D. supervisor, Mentor, Collaborator etc.)
- (vii) The Reviewer/Committee Member is involved in the preparation of the research proposal submitted by the applicant.
- (viii) The applicant has joint research publications with the Reviewer/Committee Member in the last five years.
- (ix) The applicant/Reviewer/Committee Member, in contravention to the accepted norms and ethics followed in scientific research has a direct/indirect financial interest in the outcomes of the proposal.
- (x) The Reviewer/Committee Member stands to gain personally should the submitted proposal be accepted or rejected.

3. Regulation

The ANRF shall strive to avoid conflict of interest in its funding mechanisms to the maximum extent possible. Self-regulatory mode is however recommended for stake holders involved in scientific research and research management, on issues pertaining to Conflict of Interest and scientific ethics. Any disclosure pertaining to the same must be declared voluntarily by the Applicant/Reviewer/Committee Member.

4. Code of Conduct to be followed by the Applicant for Grant

- (a) The applicant must refrain from suggesting referees with potential Conflict of Interest that may arise due to the factors mentioned in the specifications described above in Point No. 2.
- (b) The applicant may mention the names of individuals to whom the submitted proposal should not be sent for refereeing, clearly indicating the reasons for the same.

5. Code of Conduct to be followed by Reviewers/Committee Members

- (a) All reviewers shall submit a conflict-of-interest statement, declaring the presence or absence of any form of conflict of interest.
- (b) The reviewers shall refrain from evaluating the proposals if the conflict of interest is established or if it is apparent.
- (c) All discussions and decisions pertaining to conflict of interest shall be recorded in the minutes of the meeting.
- (d) The Chairman of the Committee shall decide on all aspects pertaining to conflict of interests.
- (e) The Chairman of the Committee shall request that all members disclose if they have any conflict of interest in the items of the agenda scheduled for discussion.
- (f) The Committee Members shall refrain from participating in the decision-making process and leave the room with respect to the specific item where the conflict of interest is established or is apparent.

- (g) If the Chairman himself/herself has conflict of interest, the Committee may choose a Chairman from among the remaining members, and the decision shall be made in consultation with Member Secretary of the Committee.
- (h) It is expected that a committee member will not seek funding from a committee in which he/she is a member. If any member applies for grant, such proposals will be evaluated separately outside the Committee in which he/she is a member.

6. Confidentiality

The Reviewers and the Members of the Committee shall safeguard the confidentiality of all discussions and decisions taken during the process and shall refrain from discussing the same with any applicant or a third party.

7. Code of Conduct for Officers dealing with Programs in ANRF

While it is mandatory for the program officers to maintain confidentiality as detailed in point no. 6 above, they should declare, in advance, if they are dealing with grant applications of a relative or family member (including but not limited to spouse, child, sibling, parent) or personal friend or thesis/ post-doctoral mentor or stands to benefit financially if the applicant proposal is funded. In such cases, ANRF will allot the grant applications to the other program officer.

8. Appellate authority

CEO, ANRF, shall be the appellate authority in issues pertaining to conflict of interest and issues concerning the accountability of the decision-making process. The decision of CEO, ANRF in these issues shall be final and binding.