

CONFLICTS OF INTEREST POLICY: CANCER RESEARCH UK-FUNDED RESEARCHERS AND COMMERCIAL ORGANISATIONS

1 Purpose

This policy sets out Cancer Research UK's (CRUK's) position on conflicts of interest for CRUK-funded researchers and commercial organisations.

CRUK wants researchers it funds to go beyond delivering and publishing their research to realise maximum patient benefit. We encourage engagement with commercial organisations to enable the translation of scientific discoveries into innovations that will improve the lives of cancer patients.

We need to make sure these activities with commercial organisations do not compromise the scientific integrity and delivery of, or chances of achieving impact on health from, our funded research and that potential conflicts of interest are identified and managed.

This policy aims to define:

- what constitutes a conflict of interest to CRUK;
- what CRUK requires of researchers and Host Institutions involved in our research activities;
- any actions CRUK may take if potential conflicts are identified.

2 Scope

This policy applies to researchers and their Host Institutions that submit grant applications to, or are funded by, CRUK. Researchers include for example CRUK grant applicants and grant holders, co-investigators, named research staff and students.

This policy does not cover members of CRUK's expert review panels and committees who must adhere to Section 4, Conflicts of Interest in our [Code of Practice for Funding Committees and Panels](#).

3 Definitions

Conflict of interest: a conflict of interest arises when CRUK-funded researchers or their immediate family member(s) have a personal interest in a matter which might, or might be perceived to, influence or affect the conduct, interpretation, integrity, or exploitation of CRUK-funded research.

An immediate family member includes a spouse, parent, sibling, dependent child or other dependent.

4 Key points

Researchers involved in CRUK's research funding activities and their Host Institutions must avoid any conflicts of interest which could, or could be perceived to, compromise the delivery or impact of our funded research.

This section outlines CRUK's position on potential conflicts of interest and the broad principles by which we expect these to be managed.

4.1 What constitutes a potential conflict of interest to CRUK

For CRUK, a potential conflict of interest is any interest that researchers funded by CRUK or their immediate family member may have which:

- is required to be disclosed by any policy applied by the researchers' Host Institution; or
- might reasonably be understood by the researcher or an objective observer to create a conflict with a grant application to CRUK; and/or
- creates any reputational harm to the researcher or CRUK; or
- might be seen to potentially affect:
 - the Results of the Grant Activities;
 - the publication of Results;
 - further translation or exploitation of the Results.

Potential conflicts of interest might include but are not limited to the following:

- If a CRUK-funded researcher or immediate family member has a relationship with any company or other commercial third party which might have an interest in the Results. E.g. any:
 - Consultancies;
 - Advisory roles;

- Directorships;
- Equity or other financial or ownership interest.

In relation to such relationships with commercial organisations:

- Any technology developed through previous research which might be further developed, utilised or promoted by the Grant Activities and from which technology there may be a financial interest for the company or third party or researcher directly from the commercial exploitation of such technology, including under any inventor reward scheme;
- Any interest which might affect the publication of Results based upon the conflict of interest policies applied by academic journals and publishers; and
- Any interest that a researcher may have in any entity which could benefit financially from the Results.

4.2 What CRUK requires from researchers in this regard

Researchers must:

- ensure that commitments to commercial or other activities do not prejudice the timely delivery, publication and exploitation of CRUK-funded research without the express agreement of CRUK;
- avoid any activities that jeopardise, or could be perceived as jeopardising, the ethical conduct of research and/or the potential use of CRUK-funded research outputs to improve cancer outcomes;
- disclose to their Host Institution as soon as possible any actual or potential conflict of interest related to the conduct of CRUK-funded research and/or the potential use of resulting research outputs;
- if applying for CRUK funding, disclose any potential conflicts of interest and how these will be managed to CRUK. Where required at application stage, the Lead Applicant must complete a CRUK Disclosure of Potential Competing Interests form as part of the CRUK grant application form;
- as per our [Grant Conditions](#), notify CRUK if any conflict of interest arises in relation to the Grant Activities.

In each case where a commercial entity has a potential interest in the CRUK-funded research, researchers must inform their Host Institution and comply with their Host Institution's requirements to manage any conflicts:

- before they set up their own commercial entity;
- before they act as a consultant or adviser to any commercial entity;
- before they enter into any research collaboration, sponsorship or other funding agreement with that commercial entity;

- before accepting any directorship at that commercial entity;
- if the researcher, or any immediate family member, is employed by or owns shares in, that commercial entity.

4.3 What CRUK requires of Host Institutions in this regard

Host Institutions must:

- have formal, effective policies and procedures in place to identify and manage potential conflicts of interest of researchers applying to, and being funded by, research funders such as CRUK;
- assess all potential conflicts of interest involving CRUK-funded researchers, their research projects, outputs and any further translation, to determine if the conflict is material and if so, how it should be managed;
- as per our [Grant Conditions](#), ensure that conflicts of interest and their management do not put CRUK at risk of breaching UK charity laws or regulation. The Host Institution must ensure that the Grant, the Grant Activities and the useful Results are applied for public benefit, and that any private benefit is only incidental and is not excessive;
- ensure that researcher relationships and activities that might create potential conflicts are set out in formal written agreements which protect CRUK's interests in the conduct of the research and the potential use of the outputs to improve cancer outcomes;
- ensure that agreements transferring ownership of, or licensing rights to, any CRUK-funded IP comply with CRUK's Grant Conditions.
- as per our [Grant Conditions](#), notify CRUK if any conflict of interest arises during the Grant activities.

4.4 Actions CRUK may take if potential conflicts of interest are identified

Disclosing a potential conflict of interest does not automatically preclude:

- a grant application from being awarded funding from CRUK;
- discontinuation of the Grant Activities.

In most situations, CRUK would expect there to be an appropriate mechanism in place to manage such a conflict.

If potential conflicts of interest are identified, CRUK may:

- request and discuss further information about the potential conflict and how it will be managed with the researcher and Host Institution;
- if related to a grant application, share a summary of any disclosure to the relevant funding committee;

- if it deemed the proposed mitigation steps were not sufficient, retain the right to propose and agree its own further mitigation steps to resolve any potential conflict of interest, or perceived conflict of interest, with the researcher and Host Institution. These mitigation steps would form part of supplemental terms and conditions to any CRUK Grant Award Letter.

Where there has been a potential breach of this policy or a Host Institution's policy on conflicts, CRUK:

- should be informed as soon as possible about the issues identified and the actions taken.
- retains the right to apply sanctions which may include discontinuing a grant application or grant activities or taking other sanctions as its own discretion.

5 Support & Advice

For any queries about this policy please contact:

- Funding Policy and Governance Team – policies@cancer.org.uk

For advice and support about translating research, please contact:

- Commercial Partnerships – commercial@cancer.org.uk

6 Related documents

For more information, please see the following linked documents:

- [CRUK's Conditions of your Grant](#)
- [CRUK's Research Integrity: Guidelines for Research Conduct](#)
- [Commercial Partnerships website](#)
- [Commercial Partnerships Commitments to Researchers](#)

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Executive Board or Council approval required?	Y Scientific Executive Board (SEB) approval required Version 1 approved at 6 April 2022 SEB Version 2 reviewed and approved without amendments at 9 September SEB
Date of last review	September 2024
Next review due	September 2026
Superseded documents	Version 1