

Research Grants Council

Guidelines on Handling Conflicts of Interest

INTRODUCTION

This set of guidelines elaborates on the detailed actions to be taken by External Reviewers, Members and Chairs of Panels / Committees during the handling of the Research Grants Council (RGC)'s business (including the proposal evaluation process and the monitoring and assessment process of funded projects). It should be read in conjunction with the Code of Conduct of RGC.

TYPES OF CONFLICTS OF INTEREST

Major Conflicts of Interest

2. For the purpose of this guideline, the following situations are categorized as **major** conflicts of interest:

Institution-related Conflicts

- (a) currently employed / having been employed in the past two years by the institution of the applicant¹;
- (b) holding emeritus, honorary, adjunct or visiting position(s) in the institution of the applicant¹ and receiving recurrent remuneration directly arising from the holding of such position(s);

[Note: Receiving remuneration occasionally from the institution of the applicant for presenting a talk in a seminar or teaching a short course, etc. will not automatically fall into the category of major conflict of interest. However, External Reviewers, Members and Chairs of Panels / Committees receiving remuneration occasionally will be required to specify their involvement in the business and operation of the institution concerned and to disclose the range of

¹ For individual research projects, applicant refers to the PI. For group research projects, applicant refers to all key team players (i.e. PC and Co-PIs).

remuneration received and the occasions for receiving such remuneration in the past two years when they declare the interest at the first and / or second tier of the reporting mechanism.]

- (c) serving as consultant / advisor to a committee or department of the institution of the applicant¹;

Application-related Conflicts

- (d) submitting applications as Project Coordinator (PC), Principal Investigator (PI), Co-PI, Co-Investigator (Co-I) or Collaborator in the same funding exercise;
- (e) having pre-reviewed the application;
- (f) having / having had advisor / advisee relationship (such as tutor and PhD student relationship) with the applicant¹;
- (g) having / having had co-authorship of patents with the applicant¹;
- (h) having close personal relationship (e.g. partner, spouse, immediate family Member, long-term close friend) with the applicant¹;
- (i) having / having had co-authorship of paper or publications with the applicant¹ within three years;
- (j) being / having been collaborator (in the capacity of Co-PI or Co-I) in research projects or programmes held by the applicant¹ within three years;
- (k) being / having been appointed to serve in the same editorial board by the applicant¹ (i.e. an appointer-appointee relationship); and
- (l) any other interest(s) ruled by RGC / Panel / Committee Chair to be treated as a major conflict of interest.

Minor Conflicts of Interest

3. Other than major conflicts of interest, any interest that could lead any reasonable observer to doubt the impartiality of a Reviewer's or Member's assessment is treated as a **minor** conflict of interest. Examples of minor conflicts of interests are as follows:

Institution-related Conflicts

- (a) holding emeritus, honorary, adjunct or visiting position(s) in the institution of the applicant¹ without receiving recurrent remuneration directly arising from the holding of such position(s);

[Note: External Reviewers, Members and Chairs of Panels / Committees should specify their involvement in the business and operation of the institution concerned when they declare the interest at the first and / or second tier of the reporting mechanism. Those receiving remuneration occasionally will also be required to disclose the range of remuneration received and the occasions for receiving such remuneration in the past two years.]

Application-related Conflicts

- (b) having / having had co-authorship of paper or publications with the applicant¹ from three to seven years;
- (c) being / having been collaborator (in the capacity of Co-PI or Co-I) in research projects or programmes held by the applicant¹ from three to seven years;
- (d) partnership / co-organisers of major events with the applicant¹ within seven years;
- (e) teacher at undergraduate studies;
- (f) fellow members of the same editorial board; and
- (g) any other interest(s) ruled by RGC / Panel / Committee Chair to be treated as a minor conflict of interest.

ACTIONS TO BE TAKEN

External Reviewers

4. External Reviewers should not take part in the assessment of any applications from the institution(s) (for institution-related conflicts) or the concerned applicant(s) (for application-related conflicts) in which they have declared a **major** conflict of interest.

5. It shall be for the nominating Member to decide what material effect the existence of a **minor** conflict of interest (including both institution-related and application-related conflicts) shall have on a Reviewer's assessment. Depending on the nature of the minor conflict of interest, the nominating Member may decide that:

- (a) the Reviewer concerned should refrain from assessing the particular application(s) that is / are affected by the minor conflict of interest;
- (b) the minor conflict of interest should be noted by the Panel / Committee, but it should not affect the Reviewer's participation in the assessment of the application(s); or
- (c) the Reviewer's comments on the application(s) that is / are affected by the minor conflict of interest should be disregarded if the review(s) has / have already been completed.

Members of Panels / Committees

6. Individual Members should not take part in the nomination of Reviewers, assessment, comment and grading of any applications from the institution(s) (for institution-related conflicts) or the concerned applicant(s) (for application-related conflicts) after they have declared a **major** conflict of interest. In addition, they are required to be abstained or excused from Panel / Committee meetings and interview sessions when applications in which they have declared a major conflict of interest are being discussed unless they are invited to provide opinions or stay by the Chair of Panel / Committee. In case applications submitted by Members themselves (in capacities listed under paragraph 2(d)) are discussed, the concerned Members are required to excuse themselves from Panel / Committee meetings and interview sessions.

7. For cases of **major** conflicts of interest involving Members who are serving as Subject Chairs / Sub-group Convenors / Theme Convenors in group research schemes, their role in assignment of proposals will be taken up by the Chair of Committee.

8. It shall be for the Chair of Panel / Committee to decide what effect the existence of a **minor** conflict of interest (including both institution-related and application-related conflicts) shall have on a Member's participation in the assessment. Depending on the nature of the minor conflict of interest, the Chair of Panel / Committee may decide that:

- (a) the application(s) in question need(s) to be re-assigned to another Member for assessment and the Member concerned should refrain from assessing the particular application(s) that is / are affected by the minor conflict of interest;
- (b) the minor conflict of interest should be noted by the Panel / Committee, but it should not affect the Member's participation in the assessment of the application(s); or
- (c) the minor conflict of interest or a group of minor conflicts of interest declared by a Member shall be treated as a major conflict of interest and actions stated under paragraph 6 will be taken.

9. For Members serving as Subject Chairs / Sub-group Convenors / Theme Convenors in group research schemes, the decision on cases of **minor** conflict of interest declared by them rests with the Chair of Committee.

Chairs of Panels / Committees

10. For cases of **major** conflicts of interest involving the Chair of Panel / Committee, the Chair of Panel / Committee should not take part in the assignment, assessment, comment and grading of any applications from the institution(s) in which they have declared a major conflict of interest. He / She will assign one Panel / Committee Member to take up his / her role. He / She will be abstained from Panel / Committee deliberation when the concerned application(s) in which they have declared a major conflict of interest are being discussed.

11. In the cases of the Chair of Panel / Committee having a **minor** institution-related or application-related conflict of interest, the decision on what

effect a declared minor conflict of interest would have upon his / her role in the assignment, assessment and grading of applications shall rest on the Chair of RGC.

REGISTER OF INTEREST

12. A register of declared interests of Members involved in RGC business will be maintained by the Secretariat. Individual Members are required to update the Secretariat when there is any change in their declared interests at the earliest opportunities. The declared conflicts of interest and potential conflicts of interest may be made known to the public.

APPLICABILITY

13. For the sake of clarity, the handling of conflicts of interest as stipulated in paragraphs 6 to 11 above shall apply to Members / Heads / Chairs of Panels / Committees involved in the monitoring and assessment process of RGC's funded projects, and also Members involved in the discussion at RGC and its Panel / Committee meetings.

14. The situations described above and the examples cited are by no means exhaustive. It is not possible to cover every situation where a conflict of interest may arise. In circumstances not specifically covered, External Reviewers, Members and Chairs of Panels / Committees should seek advice from the Secretariat if in doubt.

UGC Secretariat
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