

# The AAS Conflict of Interest Policy

**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 can exploit a professional or official role for personal or other benefit. Conflicts can exist if the circumstances create a risk that decisions may be influenced, regardless of whether the individual actually benefits. The perception of competing interests, impaired judgement or undue influence can also be a conflict of interest.

It is important to manage conflicts of interest in all its entirety at AAS. Not only can they bring decision-making into disrepute but often the perception of conflict alone is enough to cause concern. This could lead to irreparable reputational damage and undermine public confidence in the integrity of AAS as a pan African institution that prides itself in good governance. A failure to recognise a conflict of interest can give the impression that the AAS or the individual concerned is not acting in the public interest or that of AAS respectively. More seriously, if left unresolved, some conflicts can result in criminal action, for example fraud, bribery or corruption through abuse of position. A clear approach to managing these conflicts is therefore necessary to counter concerns about lack of fairness and transparency, and the view that conflicts of interest are influencing decisions.

## The AAS Conflict of Interest Policy Statement

The Policy shall be interpreted and applied in a way that best reflects the following principles:

- (a) To ensure fairness, transparency and consistency in any measures taken to manage Conflict of Interests;
- (c) To ensure that all Participants of AAS review processes are accountable for their actions;
- (d) To promote public confidence in all AAS operational and professional activities;

It is the responsibility of the individual to declare conflicts of interest by disclosing outside interests that could give rise to potential conflicts of interest so that others are aware in advance.

## Applicability of the AAS Conflict of Interest Policy

- 1 An applicant who has extensive and direct involvement in the development of the funding opportunity is not eligible to make any applications related to this opportunity.
- 2 A person may be considered by the AAS for membership on an AAS Review Committee or as an External reviewer unless he/she:
  - (a) is currently ineligible to apply for and/or hold grants from the AAS or research funding organisations for reasons of breach of policies on responsible conduct of research, such as ethics, integrity or financial management policies, unless otherwise agreed by the Secretary of the Review Committee
  - (b) is currently under investigation for an alleged breach of AAS policies.

If a Committee member/peer reviewer is an applicant to the same funding scheme this would represent a material conflict of interest, as it could be seen to benefit them if competing applications which they are reviewing are not awarded.

Committee members should be recused (from applications, and peer reviewers not used, for material conflicts.

Recused means does not receive papers and is excluded from discussion of that application. Grounds that hold for a member to be recused would include:

- direct personal relationships (family member, friend)
- direct professional relationships (such as current collaborators, business partner)
- if the committee member or peer reviewer is an applicant for a grant being considered at that meeting
- a sponsor of a Fellowship applicant

Conflicts of a more limited materiality can be managed using other options. Immaterial conflicts would not normally need to result in a restriction but must be discussed with the relevant decision makers to agree on how this will be managed. Examples of immaterial conflict include:

- members of the Departments or Divisions within the same institution as the principal applicant
- member of the same department or Division as a principal applicant or co-applicant (depending on level of input to the project and potential gain)

- 3 A person cannot participate in or observe the funding review committee process of an application if he/she is in material Conflict of Interest.
- 4 Review committee members, external reviewers and observers must ensure that:
  - (a) all documentation and information that the AAS entrusts to review committee members, external reviewers and observers is maintained in strict confidence at all times. Such information must be used only for the purpose for which it was originally collected, namely, to review applications and make funding recommendations as applicable
  - (b) review documentation is stored in a secure manner to prevent unauthorised access. It must be transmitted using secure techniques and when it is no longer required, it must be destroyed in a secure manner. Any loss or theft of the documentation must be reported to the AA
  - (c) all enquiries or representations received by review committee members, external reviewers or observers about an application or its review must be referred to AAS. Review committee members, external Reviewers or observers must not contact applicants for additional information or disclose matters arising from the review process to the applicants.
- 5 Additional requirements for Review Committee members and Observers:
  - (a) Review deliberations are confidential. Comments made by review committee members during the review of applications and the conclusions of the **committee's review must never be discussed or disclosed with**

individuals not involved in the review process unless required by legislation or the courts.

- (b) The identity of successful applicants and the details of the grants/awards must remain confidential until a decision is made by the review committee and officially announced to the applicants and the public. The identities of unsuccessful or ineligible applicants are not made public and must not be divulged unless required by legislation or the courts.
  - (c) During the meeting, observers must be as unobtrusive as possible to minimise disruption and must not remove from the meeting room written notes or documentation related to reviewer assignments, ratings or reviewer comments on applications.
- 6 Where AAS undertakes a joint review with an AAS Funding partner, all material terms of the partnership should be detailed in a collaborative agreement. This agreement should include an undertaking by the Funding partner to adhere to this Policy and other relevant **AAS's** policies.
- 7 Review committee members, external reviewers and observers involved in the Review Process must agree to abide by the Policy prior to commencing their participation by signing or electronically agreeing to this Conflict of Interest and Confidentiality Agreement for Review Committee Members, External Reviewers and Observers.
- 8 Accepting significant gifts or hospitality can create a perception of biased decision-making even if the gift has no bearing on judgement. However, corporate hospitality or other expenditure which is reasonable and proportionate is exempted from this definition.

If you have any questions regarding any of the AAS policies, please write to [grants@aasciences.ac.ke](mailto:grants@aasciences.ac.ke).