# Conflict of Interest Policy



# Table of contents

1	Introduction	1
	1.1 Definition	
	1.2 Purpose	2
	1.3 Scope	2
	1.4 Review	2
2	Conflicts of Interest	2
	2.1 Declaring Conflicts	2
	2.2 Managing Conflicts	2
3	Linked Documents	9

# 1 Introduction

The purpose of the Outbreak Data Analysis Platform is to provide an accessible and usable data resource to enable research that is relevant to COVID-19, including new future COVID-19 outbreaks as well as those arising from other viruses. This will accelerate scientific understanding of new outbreaks for the benefit of patients and the protection of the public.

To enable this to happen the Outbreak Data Analysis Platform (ODAP) brings together data from clinical records, research studies and audit data. ODAP is supported by UKRI and the Data and Connectivity Programme of the National Core Studies.



### 1.1 Definition

These terms define "conflict of interest" as any interest that may affect or reasonably be perceived to affect individual objectivity and independence in providing advice to the Platform, or in carrying out the duties of the ODAP Data Access Governance Committee (ODAP DAGC). An interest can be financial, business, research, research funding, intellectual property interest, public statements, positions held, employment, consultancies, directorships or any other interest.

### 1.2 Purpose

The purpose of this policy is to:

- Assist in identifying conflicts of interest
- Establish a system for declaring conflicts of interest

### 1.3 Scope

This policy applies to members of the ODAP Data Access Governance Committee.

#### 1.4 Review

This policy is managed and maintained by the ODAP data access team. It is reviewed regularly, and input is requested from the DAGC where appropriate.

## 2 Conflicts of Interest

### 2.1 Declaring Conflicts

ODAP DAGC members shall declare any interests in advance of joining the ODAP DAGC using a Conflicts of Interests form. This will be reviewed annually, and be managed by the ODAP Secretariat.

Disclosure must include sufficient information to enable appropriate resolution, which is likely to include:

- The type of potential conflict of interest
- The nature of the activity
- A description of all parties involved
- The potential financial or non-financial interests or benefits
- Any other relevant information

The Chair of the ODAP DAGC will seek verbal confirmation at the start of any meeting that the Declaration of Interests of each member is current and up to date, and in respect to the items of business on the agenda. It is the duty of each member of the ODAP DAGC to declare interests not only at the start of meetings but as and when they arise.

### 2.2 Managing Conflicts

In assessing declared interests, the ODAP DAGC Chair shall balance the nature, type and magnitude of the individual's interest and therefore the degree to which the interest may be reasonably expected to influence his or her judgment against the adequacy of measures/options available to protect the independence and integrity of the decision-making process with the Platform.

Should any conflict arise, these shall be managed using the possible courses of action listed below:

• Recommend that the concerned individual fully participate in the meeting or activity and any decision-making;



- Recommend that the concerned individual participate in the deliberations, but be recused from making any decisions, on the relevant matter under consideration;
- Recommend that the concerned individual do not participate in both the deliberations and the decision-making on the relevant matter under consideration.
- Recommend that the individual is not allowed to serve on a governance committee.

Requests for data access applications from persons associated with ODAP DAGC members, previous members/representatives or associated persons will be defined as a conflict of interest and managed using the options above by the ODAP DAGC chair.

# 3 Linked Documents

DRAFT ODAP Conflict of Interest Form