

IAI Conflicts of Interest and Standards of Ethical Conduct

At the ninth EC meeting, Paul Filmer, the USA delegate, presented a draft document on the IAI Policy on Conflict of Interest and Standards of Ethic Conduct. The EC members agreed to send their comments and suggestions to the Director, who would prepare a working document to be presented to the EC at its next meeting and forward it to the CoP for approval (Executive Council Resolution List #1, June 15, 1999).

This document outlines Conflict of Interest situations and recommends standards of conduct. The Director presents this document to the consideration of the EC with the recommendation that the approved recommendations be adopted as an official policy of IAI when making funding and budget decisions on proposals, and administration of IAI awards. Recommendations are also given regarding the limitations which service with the IAI may place on IAI personnel participation with IAI-sponsored institutions before, during and after their involvement with the IAI.

1. General

For the purpose of this document, “IAI personnel” refers to Directorate staff, members of the Executive Council (EC) and members of the Scientific Advisory Committee (SAC), unless otherwise noted.

1.1. Why should the IAI worry about Conflicts of Interest ?

The success of the IAI as an enterprise depends to a great extent on the effectiveness of its decision-making process in recommending the best and most important work to be done, whether this is the field of research or internal decision about structure or policy. If judgements and decisions of this sort cannot be made without conflicts of interests, then the IAI will not be regarded as producing reliable results, or supporting worthwhile research. The confidence of the scientific community, the Member State Governments, other donors, and the public in the integrity and effectiveness of the IAI will be severely compromised. Such confidence is extremely difficult to regain if lost.

*The IAI must therefore avoid or minimize actual **and apparent** Conflicts of Interests to maintain its integrity, internal effectiveness, and public trust.*

1.2. What is a Conflict of Interest ?

A Conflict of Interest exists when an individual has divided loyalties between the IAI and another entity. There are three basic sources of conflicts: personal interest, outside affiliations, and favors. The following illustrate cases where there is a possible Conflict of Interest:

1.2.1 Personal Interest

IAI personnel should not use their positions within the IAI to further their personal interests at the expense of the IAI (e.g. deciding to fund a conference, serving as Chair, and delivering the keynote address), or to further the interest of their friends (e.g. giving positive comments to a colleague who is responsible for evaluating a friend's proposal.)

1.2.2. Outside Affiliations

IAI personnel should not participate in decisions regarding institutions or individuals with which they have some sort of relationship (e.g. requests for funding from one's recent or near future employer, requests from relatives, requests from old advisors or students).

1.2.3 Favors

IAI personnel should not accept gifts or favors from actual or potential grantees. This behavior creates a definite impression of Conflict, if not a moral or an actual legal debt (e.g. the acceptance of travel expenses, meals, etc.)

1.3. "Disqualification"

There are certain cases where the real or apparent conflict is so strong that they would certainly damage the credibility of the IAI. These cannot be allowed to occur, and steps taken to prevent this type of Conflict should be clearly documented. Certain IAI employees and reviewers should be disqualified from participation in the decision process.

4. Flexibility and Interpretation

It should be recognized that applying Conflict of Interests rules to an extreme would lead to a situation where all the experts that IAI relied on to give opinions were disqualified. Some measure of judgment must always be applied in enforcing these rules so that such a situation does not occur.

2. Proposal Processing

All IAI personnel with a Conflict of Interest in a particular decision should identify themselves and a decision regarding the Conflict of Interest should be documented. The Director should be responsible for Conflict decisions. In the case where the Director has the Conflict, the Chief Scientific Officer should decide it (note that this may not necessarily require that the person be recused from the decision-taking process).

All reviewers of proposals, from the mail reviewers through the Director, SAC Members, and Chief Scientific and Financial Officers, should disclose any possible Conflicts of Interest. Mail and panel reviewers should do this through a signed statement.

The following situations should be considered to create disqualifying Conflicts of Interest:

1. Affiliations with an applicant institution

- a) Current appointment as a professor (including adjunct, visiting, etc.) at the applicant institution.
- b) Current employment or consideration of employment at the applicant institution (including consultancy or advisory roles).
- c) Formal or informal re-employment arrangements with the applicant institution.
- d) Visiting committee membership for the Department from which the proposal is submitted.
- e) Investment or other financial interest in the applicant institution.
- f) Office holding, membership on a governing board, or directly relevant committee membership at the applicant institution.
- g) Current enrollment as a student in the Department submitting the application.
- h) Acceptance of an honorarium from the applicant institution within the last twelve months.

2. Relationships with persons with a personal interest in the application

- a) Known family relationship with an investigator on the project.
- b) Business or professional partnership.
- c) Employment at the same institution within the last 12 months.
- d) Past or present association as thesis advisor or student.
- e) Collaboration on a project within the last 36 months.

3. Other affiliations

- a) Any affiliation as an investigator with a separate application submitted in response to the same IAI announcement.
- b) Affiliations of your spouse or children under any of the above conditions.
- c) Personal friendship or other relationship that might affect judgment, or be perceived as affecting judgment.

3. Service with the IAI

Service with the IAI – whether through paid, seconded, honorary, designated or elected positions carries certain responsibilities regarding Conflict of Interest both before, during and after the period of service.

3.1. Before IAI Service

This situation applies only to those persons who are to take up a position or responsibility within the IAI. For the purposes of Conflict of Interest, these person should be considered as if they had already assumed their roles within the IAI.

3.2. Members of the SAC as IAI Investigators

Members of the SAC may participate in proposals to the IAI as investigators, however, they should not directly contact the IAI in any manner whatsoever regarding the project, whether it is

being evaluated, administered, or closed out. An alternate investigator should conduct all negotiations, and the SAC member should not participate in any discussions or evaluations of the program under which the proposal was submitted.

3. Member State Delegates as IAI Investigators or from Institutions Submitting Proposals

While an IAI Member State may accredit a delegation to the EC or the CoP of its own choosing, it should be noted that having applicants among the delegations creates a strong Conflict of Interest of the delegation and for the body as a whole, and portrays a very biased image to the public of the decision-making capacity of the Institute.

A similar Conflict of Interest would arise from IAI Member Delegates who were employed by institutions submitting proposals. Member State Delegates should not participate in EC/CoP funding decisions with which they have Conflicts of Interest.

4. IAI Directorate Staff

IAI Directorate staff, including the Director, should in no circumstances be involved as applicants to the IAI.

5. Conflicts After Service

Staff, Members or Representatives from any organ of the IAI should be aware of the strong appearance of Conflict generated by their participation in programs subsequent to their period of service. IAI staff members should be disqualified for 2 years of participating in programs subsequent to their period of service. The period of disqualification for EC/CoP members should be of one year.