

MOH COMMUNICABLE DISEASES PUBLIC HEALTH RESEARCH GRANT

POLICY DOCUMENT ON CONFLICT OF INTEREST

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1. General

- 1.1 This MOH Policy Document on Conflict of Interest is issued under Clause 4 of the MOH Communicable Diseases Public Health Research Grant Terms and Conditions.
- 1.2 The Host Institution, Investigators and all Research Personnel that have entered into an Agreement with MOH shall be bound by and comply with this Policy Document as may be in force from time to time.
- 1.3 The terms of this Policy Document are subject to amendment, revision, variation or cancellation from time to time at the absolute discretion of MOH and it is the duty of the Host Institution and Investigator to be updated as to its latest terms.

2. Guiding Principles

- 2.1 Investigators and other Research Personnel involved in the Research must ensure that the well-being of human subjects and research integrity are never compromised by the pursuit of personal gain, interest or advantage. The robustness and validity of the Research may be called into question if biases of any form arise that could affect the planning, conduct, analysis and reporting of the Research.
- 2.2 Actual or potential conflicts of interest may arise when the personal or family interests and loyalties of the Investigator or Research Personnel conflict with the interests of relevant parties, including the MOH, Host Institution, Third Party Collaborators, sponsors, regulators, publishers and human research subjects or patients.
- 2.3 Some conflicts of interest may lead to undesirable outcomes, such as (but not limited to):
 - (i) biased judgments (for instance, in selection of human research subjects for enrollment, care provided to subjects, and use of subjects' confidential health information), resulting in loss or harm to the human research subject;
 - (ii) biases in study design, data collection and analysis, adverse event reporting, or presentation and publication of Research findings, thereby threatening scientific validity;
 - (iii) impression of perception of improper action of some or all parties concerned.

3. Examples of Situations where Conflict of Interest might occur

Financial Conflict of Interest

- 3.1 Financial Conflicts of Interest may potentially arise in the following situations (non-exhaustive list):
 - (i) Receipt of incentive payments or payment per human research subject enrolled;
 - (ii) Receipt of significant payment of any sort (such as grants, compensation in the form of equipment, retainers for ongoing consultation, or honoraria) to support activities exclusive to the costs of conducting the Research, or for any other purpose not directly related to the reasonable costs of conducting the Research;

- (iii) Receipt of compensation in any form that may be affected by or dependent on the Research outcome;
- (iv) Entitlement to Intellectual Property rights over, or proprietary interests in, the article under Research, including patents, trademarks, copyrights, or licensing agreements;
- (v) Equity interest in other sponsors of the Research.

Non-Financial Conflict of Interest

3.2 Non-Financial Conflicts of Interest may potentially arise in the following situations (non-exhaustive list):

- (i) Benefits or advantages, such as enhancement of an individual's career, education or professional reputation;
- (ii) Privileges, such as access to privileged information, or free or discounted access to resources (such as services or facilities).

3.3 At the end of the Research, MOH shall have the option to require the Host Institution to transfer ownership or make available the use of any of the Assets and Materials to MOH or any other person or body at no cost.

4. Responsibilities

4.1 It is the responsibility of the Investigators and other Research Personnel to identify and disclose to the Host Institution all Conflicts of Interest, whether actual, potential or perceived. Where there is uncertainty as to whether an interest could result in a conflict, Investigators and Research Personnel should err on the side of caution and disclose that interest for review by the Host Institution.

4.2 It is the responsibility of the Host Institution to put in place comprehensive policies and procedures to ensure that Investigators and other Research Personnel do not put themselves in a position or potential position of conflict of interest in relation to the Research, and to assess and address such conflicts if they do or potentially do arise.

4.3 At a minimum, the Host Institution's Conflict of Interest policy and procedures should —

- (i) be clear and unambiguous, transparent and readily accessible to Investigators and other Research Personnel;
- (ii) determine what is a Conflict of Interest situation that is required to be disclosed (conflicts of interest that may have an impact on human research subjects should, however, always be required to be disclosed);
- (iii) determine when disclosure of Conflict of Interest is most timely, and require Investigators and Research Personnel to provide updates and disclosures at regular intervals and as and when there are relevant changes in circumstances (such as, but not limited to, when new Collaboration Agreements are entered into, or existing ones modified);
- (iv) include possible follow-up action that may be taken to examine and to address conflict, where necessary;

- (v) always prohibit payment or the giving of other incentives, or promises or offers of payment or the giving of other incentives (for instance, from a sponsor to a member of the Research Personnel) that are conditioned upon a particular Research result or tied to a successful Research outcome;
 - (vi) be consistently applied and enforced through effective remedies and sanctions.
- 4.4 The Host Institution shall keep clear, comprehensive and updated records of Conflicts of Interest that had been reported to it and which it had dealt with in relation to the Research.
- 4.5 Upon request, the Host Institution shall make its Conflict of Interest policy as well as the records referred to in subparagraph 4.4 available to the MOH for inspection and audit.