



Population Health Improvement UK (PHI-UK)

Local Health and Global Profits

Protecting People, Planet and Equity

Conflicts of Interest Policy

This document covers the conflicts of interest policy of the Local Health and Global Profits (LHGP) research consortium, which covers both individual and institutional conflicts of interest.

The purpose of this policy and associated Declaration of Interest process is to:

- raise awareness of the extent and range of potential conflicts of interest (CsOI)
- outline the responsibilities of those funded by LHGP, whether wholly or in part
- outline the approach for preventing and managing CsOI in order to ensure the integrity of our research and the reputation of the consortium

Our approach to conflicts of interest is informed by the [UKRI declaration of interests policy](#), the [Good governance toolkit](#) and the [Seven Principles of Public Life](#).

This policy should be read alongside the [Introduction to CsOI](#), [Declaration of Interest forms](#) and [COI Working Group Terms of Reference](#), which will be introduced at key points in this policy and are available via the LHGP Sharepoint or upon request. To request these documents or for any other questions, please contact the COI working group at CDOH-COI@bath.ac.uk.

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1. Rationale for developing a conflicts of interest policy

Commercial funding of research has undoubtedly positively contributed to major scientific developments. However, it is now well established that diverse commercial actors seek to influence science in order to minimise or delay regulation, increase sales, emphasise individual responsibility for harms, narrow or distort the scope of academic enquiry around harms, and create a more favourable environment for their business.¹⁻⁴ Industry influence on science can range from the choice of research question to the

design, methods, conduct, analysis and reporting of research.⁵ In addition to directly funding research, corporations fund research through third parties, including think tanks, interest groups, patient/lived experience groups, and astroturf organisations, often to obscure the corporations' involvement.^{1,6} More generally, the increasing institutionalisation of industry involvement in science impacts the research environment, for example by influencing the research agenda of funders or skewing research questions to one conceptualisation of the problem over another.^{9,11}

As scientists, it is therefore essential that we protect against such efforts which have led to significant harm to public health.^{4,5,13} In developing and working on large research projects, preventing and managing conflicts of interest is a key way to preventing inappropriate influence on research and thus to maintain the quality and legitimacy of research and uphold the reputation of the consortium and its members.^{14,15} Recognising both the potential risks associated with commercial actor interactions, as well as potential benefits of such engagement, we aim to take a preventative approach to conflicts of interest that may expose our research to undue influence and/or reputational damage while allowing positive interactions where there is no conflict of interest.^{14,15} To this end, we have developed a conflict of interest policy and associated guidelines to prevent and manage conflicts of interest.

For a more in-depth introduction to the evidence on CsOI in science, see the [LHGP Introduction to Conflicts of Interest](#).

2. Definitions

Individual conflicts of interest arise when an individual's independence, judgment or actions relating to their primary interest have the potential to be, or be perceived to be, unduly influenced by a secondary interest.¹⁶

Institutional conflicts of interest occur when there is potential for an organisation's primary aims, independence or objectivity to be, or be perceived to be, unduly influenced by the conflicting interest of another organisation, group of individual.¹⁶

Commercial actors are here defined as engaged in buying and selling goods or services, or both, primarily for profit or return on investment.¹⁷ This includes third sector actors that are funded by, or act in the interest of, corporations.¹⁸

For a list of commercial actors that are of particular relevance to the LHGP research consortium see the [LHGP declaration of interest form](#).

3. Contexts in which CsOI may occur for researchers

We recognise the breadth of situations that may pose potential conflicts of interest for a research consortium such as LHGP. Potential conflicts of interest are not limited to financial relationships or interests and may occur through, for example, meetings, conferences, partnerships, events, advisory boards, etc. In any of these scenarios, members of LHGP need to remain aware of the various ways in which industry may try to subvert the purpose of LHGP either intentionally or unintentionally.

We provide some example scenarios below, to give an indication of the types of situations that may be relevant:

- Being invited as a keynote speaker at a conference on alcohol use and public health that is partly funded and organised by the alcohol industry.
- Being invited to co-author on a paper where the lead author received funding from the gambling industry to obtain the data.
- Being invited to participate in an event to determine the strategy of a new partnership set up by an NGO funded by the fossil fuel industry.
- Being asked to speak at the alcohol industry-funded All-Party Parliamentary Beer Group.

4. LHGP core principles related to CsOI

LHGP and its core partners:

- I. Recognise that the core mandate of LHGP is to conduct independent, high-quality research and act in accordance with, and support of, this mandate;
- II. Ensure that all key decisions about the direction of the research are free from undue influence;
- III. Aim to prevent CsOI where possible and otherwise minimise and manage CsOI through a process of openness and transparency;
- IV. Remain vigilant of potential conflicts of interest and aim to identify and mitigate or manage the impact of any COI, should they arise.

5. LHGP approach and process for CsOI

- a. Screening for conflicts of interest is an integral part of the recruitment process and should be included in the recruitment process for any role at least in part funded by the consortium.
- b. Any CsOI related to the tobacco industry prevent a person from being employed or funded by LHGP.
- c. In relation to CsOI with other commercial actors, the consortium emphasises openness and transparency, aiming to maintain an open dialogue on how potential risks resulting from CsOI will be prevented or managed.
- d. To identify and manage CsOI, all those funded at least in part by the consortium will be required to fill in and sign a [declaration of interest form](#) at the outset and update this annually if their situation changes. Through this declaration form, they confirm that they have no interests related to the tobacco industry, as declared in their job application, and declare any other conflicts of interests.
- e. To prevent CsOI, we ask those funded at least in part by the consortium to adhere to good practice by agreeing:
 - i. not to take funding from commercial actors with conflicting interests, including but not limited to those outlined in the declaration of interest form, for the duration of the consortium (at least until April 2028);

- ii. not to meet with those funded at least in part by commercial actors with conflicting interests during the course of the consortium's work, unless the benefits of such an interaction clearly outweigh the risks, and;
 - iii. not to accept employment from any of the commercial actors listed in the declaration of interest form for a period of at least one year post employment by LHGP.
- f. To aid decision-making on the potential risks and benefits of engaging in activities that might present a COI, we recommend using the 'integrity matrix'¹⁹ (figure 1) to detail the interests of both parties involved in this engagement, as far as these are known, and consider whether the interests of the commercial actor align with the interests of the consortium.
 - i. We recommend people record this decision-making, filling in the matrix below, and store this for their own records.

All those who are involved in groups, events or partnerships that may shape the direction of the research (e.g. members of advisory group or participating in annual meetings) will be required to fill in a declaration of interest form prior to their first participation in this engagement and update this form annually if the group or partnership is ongoing.

For a more detailed overview of the process of managing CsOI, including through the declaration of interest forms and for those participating in the research consortium in other capacities, see the [COI Working Group Terms of Reference](#).

If any queries or concerns arise, please contact the COI Working Group at CDOH-COI@bath.ac.uk.

Figure 1. The Integrity Matrix¹⁹

	What You Do (e.g. public health interventions, education and communication, regulatory activities)	What You Say You Do (e.g. your institution's mission statement, policies, and statements in internal and external communications)	What You Are Obligated To Do (e.g. obligations in founding documents, and other obligations required by your institution)
What They Do (e.g. their goods, services, marketing, and other business practices)			
What They Say They Do (e.g. their mission statement, value statements, and internal policies if obtained)			

What They Are Obligated To Do (e.g. under articles of incorporation, contractual obligations)			
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Figure 1 The Integrity Matrix, adopted from Marks (2019) *The Perils of Partnership*

Management statement

This policy will be reviewed annually for the duration of the consortium's work (projected to end April 2028). This policy is owned by the COI Working Group and approved by the LHGP Strategic Management Group. All those funded at least in part by the consortium may request that the policy is reviewed. We welcome and encourage you to contact CDOH-COI@bath.ac.uk with any feedback, queries or concerns.

Version Number	Status	Revision Date	Summary of changes
Version 1.0	Draft	Mar 2025	

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