

Policy for managing conflicts of interest

Introduction

The food we consume is poorly optimized for human or planetary health. This is a growing and global challenge. The ESRC Food System Trials Initiative has been established to fund research that will find ways to tackle this challenge through food system change. The initiative recognises that much of the change needed will need to be brought about by commercial organisations in the food system as well as other agencies, including the public and 3rd sector. The SALIENT Consortium has been funded by ESRC as part of a UKRI cross-council initiative and aims to work with food system stakeholders across many sectors.

Working with stakeholders in other sectors can present several challenges for university researchers. Other sectors differ from academia in their fundamental aims (e.g. generation of profit vs generation of knowledge). This misalignment of purpose can create challenges when disparate groups collaborate on research,¹ leading to conflicts of interest. It is also well-documented that some organisations engage in unethical tactics to influence research outcomes and public policy.² Therefore, any interaction between researchers and other (non-academic) stakeholders needs careful consideration. There is significant potential for scientific integrity to be undermined directly, as well as the risk of reputational damage by association. Such risks can erode the credibility of research and researchers, and adversely affect the trust that the public and policymakers have in researchers, and leads to growing scepticism of published research.³

Nevertheless, interacting with external stakeholders will be necessary to achieve food system transformation and is essential for the successful delivery of SALIENT Consortium research. To ensure that our research can take place without adverse impacts on research integrity or risk of reputational damage, safeguards will be needed.

While guidance on interacting with commercial food system stakeholders exists for governments and non-government organisations, there has until recently been no internationally agreed guidance for researchers wishing to interact with commercial organisations, or with other food system stakeholders. However, over the last few years an international consensus process has derived principles to underpin such interactions,⁴⁵ as well as guidance and a toolkit for researchers wishing to interact with commercial food organisations.³ This policy is based on the principles and processes set out in that work.

Scope and purpose of the Policy

1. The purposes of this policy and associated guidance is to:
 - support interaction(s) between the SALIENT Research Consortium and external stakeholder organisations when there are benefits from doing so for our research
 - ensure that interaction(s) with stakeholder organisations are conducted with integrity, that interests are made transparent, and conflicts of interest are managed appropriately
 - ensure that research interactions conform with UK and international conventions and regulations
 - provide tools to assess the risks and benefits of interactions with stakeholder organisations prospectively.
2. The term 'stakeholder organisation' is used here to refer to any organisation that is not part of a higher education (research) institution involved in the SALIENT Consortium. These organisations, with which SALIENT researchers will interact, may come from a wide range of sectors, not limited to: public (e.g. government, local authorities), commercial (e.g. a food business), and 3rd sector (e.g. a non-governmental organisation (NGO) such as a food bank). The term 'commercial organisation' is used here to refer to a broad range of sectors that are involved in commerce to make a profit or to support a business. SALIENT researchers are likely to encounter a wide range of commercial sectors including agriculture and horticulture, manufacturing, retail, technology, and broadcast, social and advertising

media. These may include multi-national corporations as well as small and medium size enterprises (SMEs), and may include start-ups and social businesses.

3. The principles embodied in this policy cover all the research and related activities of the SALIENT Consortium that involve interaction with one or more stakeholder organisations.
4. A distinction is made between interacting with stakeholders who are *participants* in our research (e.g. interviewees), for which no further action is needed, and interacting with stakeholders who *collaborate* with us on a piece of research in any way (except as a research participant). This policy and guidance refers to such collaborations. However, the term interaction is used throughout, since working together can take many forms.
5. This policy does not cover all aspects of research governance and it is fundamental that all SALIENT research adheres to established research governance requirements.
6. The policy may be subject to updates as experience with its use is evaluated and as international experience of managing the governance of interactions with external stakeholders (in particular the commercial sector) grows.

Principles underlying SALIENT Consortium interactions with stakeholder organisations

7. Our research ultimately aims to contribute to (a) improving population health and reducing health inequalities through improving diets, and (b) reducing the adverse impacts of the food system on planetary health.
8. The research will necessarily involve interacting with a range of stakeholders from multiple sectors who are responsible for the food system. These actors will co-produce the research, prioritise and deliver interventions, and enable us to evaluate their impact on population and planetary health.
9. In line with WHO's internationally agreed Framework Convention on Tobacco Control (to which the UK government is a signatory),⁶ the SALIENT Consortium will not support interactions with commercial or other vested interests of the tobacco industry. This includes alternative nicotine delivery system (e-cigarettes etc.) companies and research organisations owned or funded by the tobacco industry. The SALIENT consortium will permit interactions with retailers whose primary business is food (e.g. supermarkets) without condoning their sales of tobacco products.
10. With regard to all other commercial companies (in relation to the SALIENT consortium, primarily food and beverage companies), researchers should assess the risks and benefits of potential interactions (see further below). The same principles will be applied to non-commercial stakeholders.
11. The following principles cannot define every possible scenario but aim to bring some clarity to this sometimes complex and contentious area. They are organised under four headings: integrity, clarity of purpose, independence, openness and transparency.

12. Integrity

- Any interactions with external stakeholders should help the SALIENT Consortium to deliver on its strategic objectives.
- Commercial investment can accelerate benefits to society. Successful partnerships with commercial organisations may contribute to the development of a new product. However, commercial exploitation should not be the primary objective when initiating an interaction, and the scientific knowledge generated should be widely disseminated. Commercial organisations will always be expected to make an appropriate contribution to the initiative where they are a collaborating partner.
- Exclusive arrangements for commercial exploitation of knowledge generated from collaborative working can be acceptable for a time-limited period should this arise to ensure the effective impact of the outcomes of research on population or planetary health.

- The SALIENT Consortium will not endorse any product or service, and companies should not use their interactions with the SALIENT Consortium for promotional activities.
- Avoiding conflicts of interest is paramount to ensure the integrity of the research and the confidence of the public. Therefore, all potential conflicts of interest, at organisational and individual levels, must be declared and effectively managed.

13. Clarity of purpose

- Interactions between the SALIENT Consortium stakeholder organisations will have a clear purpose and all partners will be transparent as to their expectations and obligations.
- All collaborative activities, whether at a strategic or individual level, will be specified in a written agreement (e.g. a collaboration agreement and/or data sharing agreement, negotiated with the hosting university), setting out roles and responsibilities, including ownership of data and Intellectual Property (IP), and publication and dissemination arrangements. Disputes relating to such agreements will be resolved via existing university procedures.

14. Independence

- While the SALIENT Consortium will interact constructively with stakeholders to identify and prioritise interventions to bring about food system transformation, it will maintain independence in its decision-making concerning the design, implementation, interpretation and reporting of its research in order to maintain scientific integrity. Such independence in decision-making will nevertheless permit the co-production of interventions and research.
- The SALIENT Consortium will retain autonomy in deciding how their resources are used and the activities of their research staff.
- Stakeholder organisations may be consulted on interpretation of SALIENT Consortium research findings, but should not be involved in peer review or other evaluation of research by the SALIENT Consortium.
- Press releases and other contact with the media concerning research outputs in any form should be agreed with and issued by the SALIENT Consortium and signed off by the Directors.

15. Openness and transparency

- The SALIENT Consortium will be open and transparent about how and why it interacts with stakeholder organisations in collaborative research.
- The SALIENT Consortium will be clear about the potential benefits for the public as well as for the stakeholder organisations involved.
- The SALIENT Consortium will publish details of all funding it receives for its research online, and expects stakeholder organisations to be equally transparent about their involvement in research collaborations.
- The SALIENT Consortium expects the results of collaborative activities with stakeholder organisations to be reported through conventional routes, such as peer-reviewed scientific publications, as well as policy briefings, and the knowledge generated should be widely available for research and teaching purposes. There will be a requirement for the SALIENT Consortium to publish protocols and to disseminate all findings, including positive, negative and inconclusive results.
- In line with the SALIENT Consortium's data sharing policy, there is an expectation that *bona fide* researchers will be allowed access to data from collaborative research that has involved stakeholder partners for use in further research. However, where restrictions are to be applied on data access, these will be agreed by the SALIENT Consortium and associated stakeholders in advance and declared publicly.

Guidance for upholding the principles

16. SALIENT Consortium researchers wishing to interact with stakeholder organisation(s) as part of SALIENT Consortium research should first assess the risks and benefits of the interaction formally, using the FoRK Toolkit (see Flow Chart in the Appendix).³ These tools allow risks and benefits to be assessed in relation to all stages of the research process. These tools are not prescriptive about the actions researchers should take, but encourage a detailed assessment of potential stakeholder interactions on a case-by-case basis, and should help researchers to decide how to manage and mitigate risks in consultation with the SALIENT Consortium Management Group.
17. Once a decision has been made to proceed with an interaction with one or more stakeholder organisations, the SALIENT Consortium will require the implementation of the following procedures:
 - a. *Collaboration Agreement* – Researchers aiming to interact with one or more stakeholder organisations should set up a Collaboration Agreement early in the collaborative work. A Collaboration Agreement may take a number of forms and needs to be proportionate to the work involved. The formal agreement will be established and held by the host university on behalf of the SALIENT consortium, and should set out the working relationship (including expectations of each party), IP management and financial arrangements, where relevant. A collaboration agreement may be supplemented by a Data Sharing or Transfer Agreement, where data is to be acquired from a stakeholder.
 - b. *Register of Interests* – A conflict of interest can be defined as “a set of circumstances that creates a risk that professional judgement or actions regarding a primary interest, will be unduly influenced by a secondary interest”.
 - i. To promote openness and transparency, all SALIENT Consortium researchers should register secondary interests which could be deemed, or assumed to affect, the decisions (primary interests) made by those involved in the research. Where applicable, this should include both researchers and stakeholder collaborators. A register of interests will be updated annually and published on the SALIENT Consortium web site. See the recording template in the Appendix.
 - ii. There is no limit to the secondary interests that may need to be declared, but researchers should consider, in particular, pecuniary interests (for example employment, contracts, other commercial associations, as well as broader interests such as trust funds, investments, and assets) and other non-financial interests that might be deemed to influence decisions concerning the research.
 - iii. All co-funding for research or related activities from stakeholder organisations should be disclosed, as well as any personal payments made to the grant holders, such as consultancy fees, payments for speaking at meetings or for sitting on advisory panels.
 - iv. Non-remunerated interactions with stakeholder organisations should also be declared (e.g. non-paid advisory roles)
 - c. *Monitoring* – ongoing oversight of the governance of researcher-stakeholder interactions will be undertaken by the SALIENT Consortium Management Group. Any reputational risks identified by researchers will be discussed by the Consortium Management Group and appropriate actions taken to mitigate risks where appropriate.
 - d. *Disputes* – any disputes among consortium members in relation to this policy will be resolved by discussion among the SALIENT Consortium Management Group. The Directors will make a final decision to resolve disputes if necessary.
18. Establishing a collaboration agreement and a register of interests addresses many of the principles outlined above. However, the SALIENT Consortium research will evolve over time; and the priorities and objectives of university researchers and external stakeholders and their organisations can potentially come into conflict at any time. Therefore, the following sections provide some examples of good practice. Examples in the form of case studies of interactions with commercial organisations and their governance challenges can be found here [UK Health Forum report: <http://www.ukhealthforum.org.uk/prevention/pie/?EntryId43=58305>]

- a. *Publishing details of study design* – where appropriate academic and stakeholder organisations should work together to design studies in a way that minimises possible sources of bias as far as practically possible. To increase public confidence in this process, research protocols should be made publicly available as soon as possible. All evaluative and observational studies should be registered on a recognised, open and searchable register with a summary of the protocol, before the first participant is recruited.
- b. *Reporting and disseminating research outputs* - Neither the SALIENT Consortium researchers nor external stakeholders involved in joint research should restrict the publication of findings, which should be published in full regardless of the outcome of the research.
- c. Any dissemination, such as conference and other invited presentations, should be clearly *acknowledged* as supported by UKRI via the SALIENT Consortium and all other sources of funding must also be acknowledged.
- d. There may be occasions when a stakeholder organisation may wish to use the SALIENT Consortium branding for promotional activities that align to the SALIENT Consortium’s mission (i.e. publicity of the research findings). All such uses of SALIENT Consortium Branding must be approved by the SALIENT Consortium in advance and signed off by the Directors. However, it is also imperative that any external stakeholders do not use the SALIENT Consortium branding, or the standing of its associated research groups or institutions, as a hallmark of quality, or as a non-specific promotional tool, in the advertising of any product or service that they are providing.
- e. *Accepting gifts and payments from stakeholders* – Accepting gifts and other types of financial support, beyond that specified in SALIENT Consortium Collaboration Agreements, will be deemed a conflict of interest. It is common for many types of stakeholder to provide hospitality, but researchers should not accept any funds or gifts that are not covered by the Collaboration Agreement and/or openly declared. This extends to declining offers of travel reimbursement or sponsorship from stakeholders to present research findings at an event, or any other gifts. Researchers will wish to assess the risks and benefits of accepting hospitality (see Appendix 1).³
- f. *Research governance* – This guidance does not cover all aspects of research governance and assumes the SALIENT Consortium research proposals will adhere to institutional research policies and governance requirements.

References

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2. Chavez-Ugalde Y, Jago R, Toumpakari Z, et al. Conceptualizing the commercial determinants of dietary behaviors associated with obesity: A systematic review using principles from critical interpretative synthesis. *Obesity Science & Practice* 2021;7(4):473-86. doi: <https://doi.org/10.1002/osp4.507>
3. Cullerton K, Adams J, Forouhi NG, et al. Avoiding conflicts of interest and reputational risks associated with population research on food and nutrition: the Food Research risk (FoRK) guidance and toolkit for researchers. *BMJ* 2024;384:e077908. doi: 10.1136/bmj-2023-077908
4. Cullerton K, Adams J, Forouhi N, et al. What principles should guide interactions between population health researchers and the food industry? Systematic scoping review of peer-reviewed and grey literature. *Obesity Reviews* 2019;20(8):1073-84. doi: 10.1111/obr.12851
5. Cullerton K, Adams J, Francis O, et al. Building consensus on interactions between population health researchers and the food industry: two-stage, online, international Delphi study and stakeholder survey. *PLOS ONE* 2019;14(8) doi: <https://doi.org/10.1371/journal.pone.0221250>
6. Conference of the Parties to the WHO FCTC. WHO Framework Convention on Tobacco Control. . Geneva: World Health Organization, 2003.

Appendix 1: Declaration of Interests Template



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Declaration of Interests Template

Please read the SALIENT CoI Policy first to understand the purpose of this declaration. The primary purpose is to declare any interests that might conflict with the goals and work of SALIENT.

All SALIENT Investigators and staff, as well as affiliated staff or students, must complete and submit the template below, and then update and submit the template annually (by the end of March each year). Please type responses into the right-hand column in response to the questions. The table will automatically expand to accept your text.

Templates should be sent to [Trisha Gordon](mailto:Trisha.Gordon@salientfoodtrials.uk). The information on templates will be collated and made available on the SALIENT website: <https://www.salientfoodtrials.uk/>

Name:	Struan Tait
Job title/role:	Senior Study Coordination Assistant
Affiliation:	University of Cambridge
Questions (please answer both for you and for first degree relatives where relevant)	Details – please describe, indicating dates, organisations involved, positions held, nature of funding, holdings etc.
Do you have any positions with any organisations outside your main employer, e.g. as a company director, charity trustee, partner, board member etc.?	No
Do you have any employment apart from your main role through which you are associated with SALIENT?	No
Do you have any memberships of professional organisations?	No
Are you a member of any lobbying or campaigning organisations?	No
Are you involved in any consultancy work?	No
Do you receive funding from any organisations for research or other activities?	No
Do you have any share options or holdings with commercial organisations?	No
Any other interests that could be perceived to conflict with the goals of SALIENT?	No

Appendix 1

Figure 1: Flow chart – Researcher and stakeholder organisation interactions across the research process with links to stage-specific support tools³

Further tools and guidance available from: <https://www.bmj.com/content/384/bmj-2023-077908/related>

