

HRB policy on Conflicts of Interest for External Reviewers

25 March 2026



Introduction

In the context of this policy, external reviewers are defined as everybody except HRB staff who reviews funding applications or interim review documentation on behalf of the HRB. This includes expert reviewers, public reviewers, knowledge user reviewers and any other reviewers.

Independent external review of applications/interim review reports prior to any funding decision is a cornerstone of HRB decision making processes. A potential conflict of interest by anybody involved in these decisions which is not declared and managed may result in undue influence or bias and put the credibility of the HRB and external reviewers at risk. Disclosing and managing conflicts of interest protects the fairness and impartiality of the review process and the public interest.

Policy

This document sets out the policy for identifying, disclosing and handling conflicts of interests irrespective of the medium used (such as written only, face to face meeting or virtual meeting). The policy applies to all external reviewers engaged in the HRB's funding processes regardless of their background. It ensures transparency and consistency in the way conflicts of interest are handled and promotes public trust and a positive research culture.

1. The HRB requires all external reviewers to:
 - Confirm on GEMS absence of a conflict of interest before accessing an application.
 - Sign a declaration confirming no conflict or identifying potential conflicts of interest if acting as a panel member tasked with making a funding or interim review outcome recommendation to the HRB.
2. The HRB requires an external reviewer who has a conflict of interest to:
 - Disclose to the HRB the nature of their interest in advance of any review.
 - Alert the HRB at the earliest opportunity should it become clear that a potential conflict arises upon accessing an application.
 - Take no part in any consideration of the application and withdraw from the meeting for when the application is being discussed.
 - Refrain from influencing or seeking to influence a decision in relation to an application where a conflict exists.
3. A disqualifying conflict of interest exists if an external reviewer:
 - Was involved in the preparation of the application.
 - Stands to benefit directly should the proposal be accepted or rejected.
 - Is in some way related to the applicant, co-applicant, collaborator or sponsors (where applicable) at a personal or professional level.

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- Is a former supervisor of the applicant, co-applicant or sponsor (up to 5 years previously) or is a collaborator of the applicant (up to 5 years previously). There may be exceptions in the case of joint publications from large collaborative teams/consortia where neither reviewer nor applicant, co-applicant or sponsor were the senior or corresponding author.
 - May benefit financially should the proposal be accepted or rejected (for example if involved with a company acting as a project partner, or involved with a competitor).
4. A potential conflict of interest may exist in some cases that are not covered by the disqualifying conflict of interest rules indicated above. In particular external reviewers with close links to industry should carefully consider any potential for conflict of interest/perceived commercial interest that may exist.
 5. A person will not be regarded as having a conflict of interest if the interest is so remote or insignificant that it cannot reasonably be regarded as likely to influence a person in considering, discussing or in voting on, any question relating to the application.
 6. If an external reviewer is in doubt as to whether a conflict of interest exists, they should consult with HRB staff. Typically, the decision whether something constitutes a conflict of interest is made by a HRB Programme Manager. The Chair of a panel will be briefed about any disclosed conflicts of interest of panel members ahead of the meeting and plays an active role in supporting HRB staff to manage conflict of interest.
 7. A separate Conflict of Interest policy exists for HRB staff and Conflicts of Interest of members of the HRB Board are dealt with in the HRB's Governance Handbook.
 8. This policy comes into effect on 25 March 2026