

Bangalore Life Sciences Cluster (BLiSc) Conflict of Interest Policy

Bangalore Life Sciences Cluster (BLiSc): An innovative synergistic institutional model for cutting-edge scientific research and technology development in India.

The National Center for Biological Sciences (NCBS), The Institute for Stem Cell Biology and Regenerative Medicine (inStem) and The Center for Cellular and Molecular Platforms together constitute the Bangalore Life Sciences Cluster. While, each entity has its own mandate it is envisioned that the synergistic associations at the cluster will have a far greater impact on life sciences research than the sum of the individual contributions from each institution.

1. Objective

This policy is intended to increase the awareness of faculty and scientific and administrative staff at BLiSc to the potential for conflicts of commitment and interest, and to establish procedures whereby such conflicts may be avoided or managed in a transparent fashion.

2. Introduction

Staff members at BLiSc owe their primary professional allegiance to the independent institutions of the Cluster, and their primary commitment of time and intellectual energies should be to the research, training, and service programs at BLiSc. The specific responsibilities and professional activities that constitute an appropriate and primary commitment will differ across NCBS, inStem, C-CAMP and their areas of research and service, but they should be based on a general understanding between the staff and his or her Institutional head or authorized representative.

3. Entrepreneurship

BLiSc, in accordance with DSIR policy, encourages development and commercialization of inventions and innovations of research staff. Early technologies need to be developed through the transition from the laboratory to the market place. Often an early technology doesn't interest big biotech and Pharma companies, as it may be too early in the development stage or the market is too small or there are too many competing products, or the technology doesn't fit with the current interests of a large company. The lack of interest may be due to any one or a combination of the above factors. In this scenario, a start-up company can take on an early stage invention and develop it to a point where a large company will seriously consider taking it on.

BLiSc permits its researches to have equity stake in scientific enterprise/ spinoffs while in professional employment. BLiSc further recognizes that outside professional activities may be a valuable contribution to the Institute and to the researcher's professional growth. Prior approval is needed for any non-academic service or remuneration which will be evaluated with

respect to conflicts regarding national interest and/or the interest of the institutions of the BLiSc.

4. Conflicts of interest

Attempts of staff to balance BLiSc responsibilities with external activities can result in conflicts regarding allocation of time and energies. Conflicts of interest exist when an individual's external interests or personal, family, or financial considerations could improperly or adversely influence execution of his/her responsibilities at BLiSc. Staff at BLiSc must ensure that their activities on and off campus do not compromise the integrity of the institution. External activities may require significant time commitment from BLiSc staff such that they are unavailable to effectively discharge their prescribed duties towards BLiSc. Confidential information available to the staff member in the context of work at the BLiSc may be valuable in external or personal contexts, and use of such information for external or personal purposes will constitute misuse of such information and will fall within the ambit of conflict of interest.

Conflicts of interest often arise at the intersection of two fundamental missions: to push the boundaries of knowledge and to transfer that knowledge to the private sector in the larger interest of the Society. There may be, for example, significant personal financial incentives related to outside consulting, patenting and licensing an invention, or being involved with a 'start up' company. Staff relationships with startup companies - newly-formed, privately-held, for-profit companies based on BLiSc's intellectual property –can frequently present multifaceted conflicts of interest. Considerations of personal financial gain, however, must not influence the decisions or actions of individuals in carrying out their BLiSc responsibilities. The perception that such incentives might harm research objectivity, hinder academic freedom, the protection of human subjects, or adversely affect other institutional responsibilities in the areas of education or administrative activities is enough to mandate that such conflicts be disclosed and then eliminated, mitigated or managed.

There is nothing inherently unethical in finding oneself in a position of conflict of interest; what is required is to disclose it and manage it appropriately. Any outside professional activity must be undertaken in a transparent manner such that there is no compromise on the researcher's primary responsibilities with regard to the conflicts of interest guidelines. It is therefore incumbent that all such outside professional activities are to BLiSc.

5. The following do NOT constitute financial conflicts of interest:

- salary, royalties, or other remuneration received from BLiSc
- income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities;
- income from service on advisory committees or review panels for non-profit entities;
- Income and investments of a nature unrelated to research and activities at BLiSc.
- BLiSc does not consider royalties to present a potential conflict of interest.

6. Disclosure of Conflicts

Disclosure is the key mechanism to bring potential conflicts of interest to light for evaluation and possible oversight. The responsibility for avoiding potential, apparent or actual conflicts of interest begins with the individual. If a situation arises that could present a conflict of interest, the employee must make full disclosure of the relevant information to his/her respective head of institution. BLiSc requires that staff file a disclosure form annually or when there is a potential conflict arising, which will be considered by the competent authority of BLiSc for appropriate decision.

7. Activities requiring disclosure are outlined below:

7a Research and Scholarly Activity

- Disclosure is required when a Research Scholar of BLiSc involved in any research or scholarly activity has a significant financial or other interest that could affect the approval, design, conduct, or reporting of funded research.
- Disclosure is also required when a Research Scholar or any of his/her family members has a significant financial or other interest in a commercial sponsor of BLiSc research and the employee has responsibility for designing, conducting or reporting the research and/or the research will involve BLiSc colleagues. Disclosure is also required when external considerations may result in restrictions on the publication rights of BLiSc employees.

7b BLiSc Administrative and academic duties

Staff at BLiSc are expected to take on several administrative duties in the course of their work. Several areas of conflicts of interest could potentially arise when the official responsibilities/activities of the staff member overlap personal and professional relationships, for example, from family, friends, students and collaborators. In order to avoid

such conflict of interest, it would be necessary for the concerned staff member to make disclosures to the relevant authority (generally the Head of the Division where the staff member is working and to members of the Conflict of Interest Committee) regarding potential conflicts in regard to the following:

- Recruitment
- Committee composition
- Review and evaluation processes
- Decision-making resulting in benefits or penalties
- Approvals on academic matters
- Approvals on internal funding decisions
- Institutional MoUs
- Procurement proposals
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7c Time commitment

Staff at BLiSc are expected to adhere to time commitment norms agreed for them with their respective operational heads. Any significant deviations from these norms and absences from the BLiSc campus should be discussed beforehand with the competent authority- including absence on health and other personal grounds or for professional development and collaborative research. New staff joining BLiSc on a shared basis with other organizations should work with the competent authorities at both ends regarding the terms. A tri-partite shared employment agreement between the staff member, BLiSc and the external entity must be in place and endorsed and recorded by the competent authority at BLiSc. The total time commitment of BLiSc staff for external professional activities must not exceed 10% of their time spent on BLiSc activities. Exceptions to this must be discussed and agreed with the competent authority.

7d Intellectual Property

- While staff of BLiSc are encouraged to commercialize their discoveries and patents, disclosure is required when an employee is a named inventor of intellectual property owned by BLiSc and the employee has a significant financial or other interest in a business entity related to the intellectual property.

7e Procurement

- Disclosure is required when an employee of the BLiSc or a member of his/her family* has a significant financial or other interest in a business entity proposing to enter into a

transaction with the BLiSc and that employee or family member is in a position to influence the outcome of BLiSc's decision on that transaction. Early disclosure prior to the transaction is required except in cases where the employee himself/herself is not aware, in advance, of the financial or other interests or other details of the proposed transactions.

- Disclosure is required when an employee or family member has a significant financial or other interest in a business entity that provides goods or services and the BLiSc provides the same or similar goods and services, and the employee is in a position to direct potential purchasers of the goods and services away from the Centre to the business entity. This provision does not cover consulting by faculty or staff.

** family is defined as spouse, children and close relations*

7f Creation of a new start-up company

Staff who are founders of start-up companies are assumed to have intellectual and financial responsibilities to the company. These responsibilities must not be in conflict with BLiSc duties. Under these circumstances, BLiSc staff must not have direct operational responsibility at the company and must strive to keep their financial interests separate from their BLiSc duties. No disclosure of research results arising at BLiSc must be made to the company and BLiSc staff pursuing research at the faculty's laboratory must be free of any pressures arising from company obligations. It is mandatory that such an engagement be disclosed to BLiSc.

7g External consulting and receipt of financial remuneration from outside entities

The primary allegiance of BLiSc staff must be to the research and training programs on campus and any external consulting activities must not be in conflict with this primary mandate. The consulting should be separate from the primary research at BLiSc. The external entity must not be privy to unpublished research results emerging from BLiSc without the approval of the Institutional head. A tri-partite consultancy agreement between the investigator, BLiSc and the external entity must be in place and endorsed and recorded by the competent authority at BLiSc before engaging in these activities.

7h. Engagement in service roles for external organizations

Staff members of BLiSc are permitted to be on advisory boards of external organizations provided such a role is not in conflict with their primary responsibilities at BLiSc. Financial interests arising from such service should be kept separate from BLiSc duties. However, all such engagements have to be disclosed to BLiSc prior to taking them up.

7i. Submission of grants for funding innovation (such as SBIR/STTR)

BLiSc encourages the channeling of campus research into outcomes of use to Society and is supportive of faculty applications for grants funding innovation, both from Governmental and other sources. However, such projects could generate several conflicts of interest for the faculty member and should therefore be first discussed with the appropriate institutional authority before the application is submitted.

7j. Sponsorship of a research project by a new outside entity

All potential sponsorship of research at BLiSc by external agencies, particularly from philanthropic and for-profit sources must be first discussed with the Research Development Office. Such sponsorship must not be in conflict with the primary duties of the faculty member at BLiSc nor with institutional norms. The terms of use of intellectual property arising from such sponsored work will be vetted by the IPMO at BLiSc and there will need to be a fully executed agreement between BLiSc and the external agency before such sponsorship can be considered as valid. Staff must not negotiate directly with such sponsors.

8. Disclosure content

As per Annexure

9. Responsibility of BLiSc

9a The following officers at BLiSc have overall responsibility for overseeing timely collection and review of annual and interim disclosure statements as well as interpretation of the policy and arbitration and management of conflicts in respect of staff members in their respective institutes::

NCBS: Dean of NCBS

inStem: Dean of inStem

CCAMP: CEO of CCAMP

9b Conflict of Interest Committee

The officer responsible for implementing the conflict of interest policy for each BLiSc member institute will appoint a committee for assessing any potential conflict of interest. The committee may comprise of members of the faculty or other well-qualified individuals either from within or outside the institute. The mandate of the committee will be to:

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- consider whether a conflict exists,
- evaluate the severity of the conflict
- recommend to the competent authority the steps necessary, in its view, to resolve the conflict.

In case of a dispute, the Chair of the Cluster Board will be the final adjudicator.

ANNUAL DISCLOSURE FORM

The annual disclosure form must be completed by all BLiSc staff. The form must be submitted annually before March 31st, for any activity anticipated to occur during the upcoming financial year (April-March) and given to the immediate supervisor who will then forward collectively for the team, to the appropriate institutional authority. This exercise will be conducted at the start of each financial year.

New employees joining BLiSc must submit the disclosure form, through their operational heads, within 30 days of date of joining at BLiSc.

In addition, each BLiSc member must submit an updated disclosure within 30 days of discovering or acquiring a new financial interest.

Activities requiring disclosure include:

- A. Intellectual or financial interest in a newly setup or existing company
- B. Changes in personal financial remuneration received from outside entities (e.g., additional consulting).
- C. Engagement in or changes in an external service role or position
- D. Submission of applications, in personal capacity, for funding under mall Business Innovation Research Initiative (SBIRI), Small Business Technology Transfer (STTR) and such other schemes.
- E. Sponsorship of a research project by a new private sponsor

The following officers at BLiSc have overall responsibility for overseeing timely collection and review of annual and interim disclosure statements as well as interpretation of the policy and arbitration and management of conflicts in respect of staff members of their respective institutes:

NCBS: Dean of NCBS

inStem: Dean of inStem

CCAMP: CEO of CCAMP

Name: _____

Designation: _____

Annual Submission: Updated Submission:

Date: _____

In this upcoming financial year will you encounter any of the following?

**Q1: Will you have intellectual or financial interest in a newly setup or existing company?
Yes/No (If yes please provide details below)**

- a. Name of the company:
- b. Position you hold at the company:
- c. Describe your duties for the organization
- d. How much time do you anticipate setting aside per year for activities relating to the company
- e. Will the company make any financial contribution to BLiSc?
- f. If yes, will the company expect anything in return from BLiSc?
- g. Describe the activities conducted by the business and how they relates to your duties towards BLiSc:

Q2: Will you receive compensation or gratuities, in addition to your remuneration from BLiSc, directly from any external individual or entity? Yes/No. (If yes, please provide details below).

- a. Name of the individual or entity:
- b. The nature and value of the compensation or gratuities
- c. Does this individual/entity transact business with BLiSc? Yes/No

- d. If Yes, describe the nature of the engagement between the entity with BLiSc.

Q3: Will you serve in an executive position in a for-profit or not-for-profit business entity? Yes/No. (If yes, please provide details below).

- a. Name of the external organization:
- b. Position you hold:
- c. Describe your duties for the organization
- d. Does this organization have any engagement with BLiSc?
- e. Describe the activities conducted by the business and how they relate to your duties towards BLiSc:

Q4: Will you have a financial interest in a for-profit business, which conducts research or other activities in an area related to BLiSc? Yes/No (If yes, please provide details below)

- a. Name of the business:
- b. Describe the activities conducted by the business and how they relate to your duties towards BLiSc:
- c. Describe the nature and amount of your financial interest in the business

Q5: Will you have a financial interest in a business that competes with services provided by any of the institutes constituting BLiSc? Yes/No (If yes, please provide details below)

- a. Name of the business:
- b. Describe the activities conducted by the business and how they compete with services provided by BLiSc:
- c. Describe the nature and amount of your financial interest in the business

Q6: Will you or your immediate family serve on the board of directors or scientific advisory board of a for-profit organization that provides financial support for research at BLiSc that is conducted by you? Yes/No (If yes, please provide details below).

- a. Name of the external organization:
- b. Position you/ your family member hold:

- c. Describe your/your family member's duties for the external organization
- d. Describe the research funded by the external organization

Q7: Have you applied for or plan to apply for a SBIRI/STTR/similar grant? Yes/No. (If yes, please provide details below).

- a. What is the planned source of funding?
- b. Brief description of the concept (project details, funding amount, etc)
- c. Have the terms of the engagement been discussed with the appropriate institutional authority?

Q8: Is your work to be funded by an organization with commercial interests? Yes/No. (If yes, please provide details below):

- a. Name of the company:
- b. Brief description of the funding (project details, funding amount, overlap with current projects)
- c. Have the terms of the engagement with the company been discussed with the appropriate institutional authority?

Q9: Do you or members of your immediate family have financial or other interests in an entity that provides services or materials to BLiSc? Yes/No (If yes, please provide details below).

- a. Name of the external organization:
- b. Details of the transaction involved:

Q10: Any other information that you would like to disclose that might constitute a conflict of interest to your role at BLiSc (Please detail below).

Certification

I have carefully read the **Conflict of Interest Policy** and understand the intention of this disclosure. I certify that the information I have provided indicates all potential Conflict of Interest with regard to my position at BLiSc. I acknowledge I have a continuing obligation to file an updated form for each new activity initiated during the financial year.

Signature

Date