

Orchard OCD Funding Conflict of Interest Policy

By adopting the present conflict-of-interest (COI) policy, Orchard OCD ensures that its funding decisions are made fairly, transparently, and without any undue influence. More specifically, the reason for regulating conflicts of interest is to ensure that secondary interests do not subvert or unduly influence any of the organisation's decisions and actions concerning Orchard's primary interests and do not compromise trust in the organisation.

This policy relates to all committees and funding panels of Orchard OCD, their chairs, and other members, including trustees.

1. Elements of a conflict of interest

Main/primary interest(s): these are Orchard OCD's purpose and goals, that is, funding and conducting innovative scientific research to identify and develop new and better treatments for OCD, with the ultimate goal of making possible a world where all individuals with the disorder can access timely and effective treatment for their condition. Orchard OCD also aims to raise awareness around OCD and its impact on people with the condition and society, making the scientific community and the public aware of the importance of learning about it.

Secondary interest(s): they may include financial gain, the desire for professional advancement, and recognition for personal achievement. Most secondary interests, including economic interests, are—within limits—legitimate and even desirable goals. The secondary interests are disagreeable only when they have greater weight than the primary interest in professional decision-making. For example, for a member of Orchard OCD's Scientific Advisory Board (SAB), a secondary interest may arise when someone by whom they have financial or professional returns submits a project proposal to Orchard OCD.

The conflict itself: a conflict of interest exists when a particular individual or institution is influenced by one or more secondary interests. It is not an occurrence in which primary interests are necessarily compromised but, rather, a set of circumstances or relationships that lead to or increase the risk that the primary interests will be neglected due to the pursuit of secondary interests.

Considering the above, a conflict of interest is a set of circumstances that creates a risk that a secondary interest will unduly influence professional judgment or actions regarding one or more primary interests. Within Orchard OCD, this translates in situations where an individual trustee's, employee's, or volunteer's personal, professional, or financial interests interfere with their ability to make impartial decisions in the best interest of the charity or when, driven by secondary interests, they engage in activities which may potentially affect Orchard OCD adversely.

2. Conflict of Interest Assessment

Within Orchard OCD, a conflict-of-interest assessment will be performed anytime relevant decisions are to be made about scientific research funding.

2.1. Declaration: At the beginning of each SAB meeting involving a project evaluation and consideration for funding, a COI declaration form will be completed, signed, and submitted by each SAB member, trustee, and staff member.

2.2. Identification: The early identification of conflict of interest is crucial to ensuring that any potential conflict of interest does not prevent SAB members and trustees from making decisions only in the best interests of Orchard OCD. All SAB and staff members, as well as the trustee body, must be able to identify any potential conflict of interest at an early stage to avoid putting themselves in a position where their duty to act in the best interests of Orchard OCD could conflict with any personal interest they may have. Therefore, the charity will train all its SAB and staff members, trustees, and volunteers on the content of the current policy, which will be reviewed, if necessary, every two years. Furthermore, since social science research suggests that, in some cases, secondary-interests-related influence may operate on decision-making processes without an individual being conscious of it, a third neutral party will annually evaluate the presence of any kind of COI among SAB and staff members, trustees, and affiliated professionals and volunteers. These documents will then be shared with the SAB Chair and Vice Chair, the staff, and Orchard's CEO so they know the potential conflicts their colleague(s) might have and can act as outlined in the present document.

2.3. Measurement:

Conflicts of interest are often not binary; that is, they are not merely present or absent. They can be more or less severe. The severity of a conflict of interest depends on (1) the likelihood that a secondary interest would unduly influence professional decisions made under the relevant circumstances and (2) the seriousness of the harm or wrong that could result from such influence. The criterion of proportionality in conflict-of-interest policies provides that the expected benefits of a relationship may be considered, and conflicts of interest may be allowed to continue if those benefits outweigh the risks and safeguards instituted.

2.3.1. Likelihood of undue influence: The measurement of the likelihood of undue influence on the interested member's decision-making process will be guided by the following questions:

- a) What is the value of the secondary interest?
- b) What is the scope of the relationship?
- c) What is the extent of discretion?

2.3.2. **Potential Harm Seriousness:** The measurement of the seriousness of possible harm to Orchard OCD's primary interests deriving from a member's secondary interest will be guided by the following questions:

- a) What is the value of the primary interest?
- b) What is the scope of the consequences?
- c) What is the extent of accountability?

3. Conflict of Interest Management

3.1.**Disclosure:** All individuals involved in the funding decision-making process, including trustees, advisors, staff members, and volunteers, must disclose any potential conflicts of interest before the discussion about the funding decision begins or during the meeting as soon as a potential conflict becomes apparent. This includes any financial, personal, or professional direct or indirect relationships that may influence their decision-making. In cases where an individual is uncertain whether a conflict of interest exists, they should report this to nominated trustees. The trustees shall discuss the matter with the individual as necessary and report to the Chair, who will decide on a course of action. Orchard OCD will assess all potential conflicts of interest to determine their impact on the funding decision. This process will follow the procedure outlined in section 2 (i.e., Conflict of Interest Assessment) of the present document.

3.2.**Prevention:** Following the COI assessment procedure, if a member's potential conflict might negatively impact decision-making or their loyalty to the charity, specific steps are taken to safeguard the integrity of the decision-making process.

If a member has a potential conflict, they may be asked to distance themselves from certain activities or discussions related to the conflict. However, Orchard OCD also values the expertise of its members. In situations where a member has unique knowledge that would benefit the board or staff, they might be allowed to share pertinent information. Still, they would be expected to exit the meeting before any in-depth discussion or vote on the conflicting topic. Any discussion records related to the conflict will be excluded from the member's documents.

The protocol also covers specific scenarios. For example, if a panel chair has a vested interest in a grant application, they are expected to declare that interest. They would then recuse themselves from the relevant meetings, allowing a vice chair to oversee proceedings to ensure no undue influence. If a committee member is approached by someone applying for technical advice on an application, while they can provide guidance, they are obliged to report this interaction to the committee chair.

Additionally, members in positions that might be seen as in direct competition with an applicant or those who have had professional interactions with an applicant within the last five years need to declare their interest. Depending on the severity of the COI, they might be asked to withdraw from the meeting entirely or may be allowed to remain but not vote.

Orchard OCD understands that most conflicts are specific to a particular issue and don't typically lead to lasting restrictions on a member's involvement with the organization. However, in rare instances where major conflicts might jeopardize a member's position, the case will be referred to the entire committee, whose decision should be taken as final. If there's uncertainty about whether a conflict exists, the individual should consult with nominated trustees. The trustees will then communicate with the Chair for a final decision.

N.B.: Documentation is paramount. Orchard OCD maintains comprehensive records of all potential and actual conflicts, which can be accessed through our register of interests. Transparency is a cornerstone of our approach, with a commitment to clearly communicating the conflict-of-interest policy and the steps taken to mitigate potential conflicts to all stakeholders.

This document is subject to revisions and updates as deemed necessary by Orchard OCD.