

**The Ordinance**  
**of the President of the Medical Research Agency**

**no. 20**

**of 30 December 2019**

**on the Code of Ethics of the Medical Research Agency including elements of anti-corruption policy**

Pursuant to Article 7, section 1 of the Act of 21 February 2019 on the Medical Research Agency (Journal of Laws of 2019, item 447), it is ordered as follows:

**§ 1**

*The Code of Ethics of the Medical Research Agency including elements of anti-corruption policy* constituting an appendix hereto is hereby adopted.

**§ 2**

The Ordinance shall become effective upon the date of its signing.

**The signature is correct**

Document signed by  
Radosław Sierpiński: MRA  
Date: 2019.12.30 1:35:32 CET

## **Code of Ethics of the Medical Research Agency including elements of anti-corruption policy**

### **1. Project evaluation**

- a. Each grant application submitted in the form and within the deadline provided for in the regulations of the call for proposal is subject to evaluation, unless it has been withdrawn by the applicant. Project evaluation shall consist in verification whether the project complies with the criteria stipulated in the regulations of a given competition using the same valuation criteria.
- b. The task of the members of the Application Evaluation Team (AET) is formal or content-related evaluation of the grant applications submitted for calls of proposals announced by MRA and of reports from their realisation.
- c. The evaluation must be objective, impartial, reliable and independent.
- d. For the purpose of evaluation the expert shall be professional, performing his/her duties with the highest degree of diligence, use his/her knowledge and skills to the best of his/her abilities.
- e. In the performance of tasks the obligation to maintain confidentiality shall be applicable with regard to the subject matter, manner and contents of the evaluation and its participants. Sharing any information and evaluations regarding the application/report subject to evaluation with other persons and with the members of the AET outside the official meetings in connection with the evaluation of projects/project reports shall be unacceptable.
- f. The expert must not contact the Applicant independently.
- g. If the Applicant attempts at contacting the Expert, the Expert may not continue such a contact and he/she shall immediately inform the AET secretary.
- h. All AET members shall be obliged to familiarize with premises indicating a conflict of interest with regard to individual projects.
- i. The Expert shall care for his/her own reputation and the reputation of other Experts and of the Medical Research Agency.

### **2. Conflict of interest**

- a. A conflict of interest shall mean a situation in which acting for own benefit, whether personal, material, procedural or psychological, affects the issuance of an opinion or undertaking actions against the interest or in the interest of another person.
- b. Impartiality of the AET members must not raise any doubts. For the purpose of identification of a potential conflict of interest, each member of the Application Evaluation Team must read the developed rules and sign a relevant declaration, obliging him/her to observe the rules stipulated in the document. The required declarations of the AET members, appointed by the President of the Agency, aim at identification of potential and real situations which may constitute a conflict of interest and therefore result in lack of objectivity or in partiality of opinions.
- c. AET members must be obliged to equal treatment of all Applicants.
- d. A situation in which an AET member participating in the competition is personally interested in its results shall be unacceptable. The Applicants must be convinced and certain that they shall be treated according to equal rules and that their applications shall be evaluated according to uniform,

objective rules.

- e. In the performance of their tasks, AET members shall observe the confidentiality clause with regard to the evaluation process, evaluation contents and the persons preparing the evaluation. If, during the application evaluation, an AET member identifies the existence of any circumstance that could affect the impartiality or reliability of his/her evaluation, he/she shall be obliged to immediately inform the President of MRA or a person representing him.
- f. When assigning the project to the experts for evaluation, the AET members being the employees of MRA shall take into account the possibility of a conflict of interest, but the complexity of situations that may fall within its definition is possible to be fully identified only by the persons having full knowledge of all premises which may comply with the definition of a conflict of interest.
- g. In the call for proposal procedure an opinion prepared by the expert found in a situation of conflict of interest shall not be taken into account.

## **2.1 Premises for a conflict of interest**

The premises indicating a conflict of interest with regard to the members of the Application Evaluation Team exist when:

- a. The AET member was indicated in the project as one of the main authors, project contractors, persons conducting the research in the centre implementing the project, is a manager/employee of the unit in which any planned research is to be conducted, for the purposes of implementation of the evaluated project, or was involved in editing of the application at any stage.
- b. The AET member has a financial interest connected with the project implementation, which means that the project implementation would generate direct financial gains to the AET member, his/her spouse, person remaining in close relationship with the AET member, his/her close family members (parent, child, a person being in a legal guardian or curator relationship previously or currently). Such persons shall not be in the studied group within the project (clinical research beneficiaries). A financial interest shall also be any received remuneration from an institution being an applicant both currently and within the last 3 years.

## **3. Principles for submitting a project for evaluation**

- a. Submission for third-party review and preparation of reviews is a very important element of project evaluation and it shall take place in accordance with the rules of maximum degree of objectivity and reliability.
- b. MRA employees perform the initial analysis of the projects eligible for substantive evaluation in terms of their specificity, selecting for the substantive evaluation the experts who have the relevant knowledge and experience allowing for high quality of content-related evaluation, taking into account elimination of a possible conflict of interest, evaluated in particular on the basis of analysis of documentation submitted by the experts. Prior to final assignment of a given project to an expert, MRA provides the details of the projects to the expert, allowing him/her to determine whether there is a potential conflict of interest. The minimum scope of the details provided to the expert shall include: the name of applicant and partners, project title as well as first and last name of the main researcher.
- c. Identification of existence of any circumstance that may affect the impartiality and reliability of evaluation shall impose on the AET members the obligation to immediately inform the President of MRA or a person appointed by him.
- d. The President of MRA, together with the selected AET members, assigns the applications for evaluation by third-party experts (who become AET members upon acceptance of a project for evaluation). If the expert finds out that he/she is in a situation of potential or actual conflict of

interest, the President of MRA shall exclude him/her from all stages of proceedings of a specific project; e.g. when the expert evaluating the project and the manager of the evaluated project are members of the same organisations or bodies (e.g. university faculty, institute, scientific council, supervisory board), such an expert must be excluded from the process of individual evaluation due to occurrence of the premise: “is a co-operator of an entity filing an application”. The expert shall be obliged to disclose a conflict of interest pertaining to the application assigned to him/her and withdraw from its evaluation.

- e. In matters not provided for herein, the standards stipulated in the rules and guidelines entitled *Good Manners in Science* and in the recommendations entitled *Good Research Practice Guidelines* shall apply accordingly.