आई सी एमआर– राष्ट्रीय व्यावसायिक स्वास्थ्य संस्थान
स्वास्थ्य अनुसंधान विभाग, स्वास्थ्य और परिवार
कल्याण मंत्रालय, भारत सरकार

ICMR - National Institute of Occupational Health
Department of Health Research, Ministry of Health
and Family Welfare, Government of India

संख्या. 1/परिपत्र/2026-27/1143

Date : 14/10/2026

परिपत्र/Circular

Sub: Adoption and Implementation of the ICMR Conflict of Interest(CoI) Policy – reg.

Vide ICMR OM No. E16/27/2026-Admn II dated 11/10/2026, it has been informed that Hon'ble Union Minister for Health and Family Welfare (HFM) has approved adoption of the ICMR Conflict of Interest(CoI) Policy. The policy, enclosed herewith, provides a framework for the declaration, disclosure and management of actual, potential and perceived conflicts of interest in matters relating to ICMR's intramural and extramural research grants, consultations and other stakeholder engagements.

All officials are requested to ensure strict compliance with the provisions of the enclosed policy and take necessary action for its effective implementation.

14/10/26

(राहुल वाधवानी / Rahul Wadhwani)
(व. प्रशा. अधिकारी /Sr. Admin. Officer)

प्रति/To :

सूचनापट्ट/Notice Board

प्रतिलिपि/Copy to :

- OIC, ROHC(S), Bangalore –for necessary compliance
- Dr. L K Sharma – with a request to upload the said circular on the website please.

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भारतीय आयुर्विज्ञान अनुसंधान परिषद
स्वास्थ्य अनुसंधान विभाग, स्वास्थ्य एवं परिवार कल्याण मंत्रालय, भारत सरकार

Indian Council of Medical Research
Department of Health Research, Ministry of Health and Family Welfare, Government of India

No.16/27/2026 –Admn II **Dated: /09/2026**

OFFICE MEMORANDUM

Subject: Adoption and Implementation of the ICMR Conflict of Interest (CoI) Policy – reg.

The ICMR Conflict of Interest (CoI) Policy has been approved for adoption by the Hon'ble Union Minister for Health and Family Welfare (HFM). The policy, enclosed herewith, provides a framework for the declaration, disclosure and management of actual, potential and perceived conflicts of interest in matters relating to ICMR's intramural and extramural research grants, consultations and other stakeholder engagements.

All Directors of ICMR Institutes/Centres and Divisional Heads of ICMR Headquarters are requested to ensure strict compliance with the provisions of the enclosed policy and take necessary action for its effective implementation.

Digitally signed by
Jaibir Singh
Date: 11-10-2026
12:14:08
(Jaibir Singh)
Assistant Director General (Admin)

Encl.: ICMR Conflict of Interest (CoI) Policy.

Copy to:

1. PS to DG/Addl. DG/Sr. DDG(A)/Sr. FA
2. All Heads of Division, ICMR Hqrs
3. Directors/Directors- in – charge of all Institutes/Centers of ICMR
4. DDG/ADGs
5. Dr.M.S Chalga Sci- E, ICMR hqrs- to upload in ICMR website.

वी. रामलिंगस्वामी भवन, पोस्ट बॉक्स नं. 4911,
अंसारी नगर, नई दिल्ली - 110 029, भारत
V. Ramalingaswami Bhawan, P.O. Box No. 4911,
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+91-11-26589336 / 26588707
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ICMR Conflict of Interest Policy

Indian Council of Medical Research
V. Ramalingaswami Bhawan, Ansari Nagar
New Delhi-110029

2026

ICMR Conflict of Interest Policy

Introduction

The Indian Council of Medical Research (ICMR) is an autonomous organization under the Department of Health Research (DHR) for planning, promoting, coordinating and conducting biomedical research in India. The objectives of ICMR are in consonance with the National Health Policy and aim towards improving the health of the people of India through biomedical research. ICMR (established in 1911) is one of the oldest medical research organizations in the world, with a broad mandate to generate new knowledge through the conduct and support of biomedical research in all areas that would have a bearing on improving the health of Indian people. The ICMR focuses on biomedical research through intramural and extramural research grants and fund four types of research viz., discovery, development, delivery or implementation and descriptive research.

Under intramural research, it provides financial assistance to its own institutes/centres to conduct research based on its mandate and priorities by its scientists (https://www.icmr.gov.in/intramural-grants). Under extramural research, it provides financial assistance to non-ICMR Indian scientists to conduct research in medicine, public health and allied disciplines under Small grant, Intermediate grant, and Centre for Advanced Research (CAR) (https://www.icmr.gov.in/extramural-grants).

2. Purpose

The Conflict of Interest (CoI) Policy is an objective framework aimed at ensuring integrity and to minimize potential bias in decision-making processes. It will promote transparency, enhance accountability within funding mechanisms and reassure researchers and the public in the fairness of grant awards. By establishing clear standards and procedures, the Policy seeks to reduce all forms of bias and ensure that decisions are made in a fair, transparent, and impartial manner.

3. Scope

This document shall serve as ICMR Policy for the declaration and management of CoI related to ICMR's extramural and intramural research grants, consultations, and/or engagements with stakeholders.

For undertaking biomedical research, ICMR take the assistance of external experts and to ensure integrity and maintain public confidence in its activities, it requires experts to disclose any state of affairs that may give rise to a potential conflict of interest related to the subject of the activity in which they are going to be involved.

In ICMR, a scientist as Programme Officer is a role focused on the implementation and management of specific health research programmes. They work on projects, monitor progress, and often contribute to translating research findings into public health policy. Their responsibilities can include physical and financial monitoring of projects, organizing meetings, and utilizing computer applications.

A well-defined ICMR-CoI policy is essential to safeguard the objectivity, ethics, and credibility of research values that are fundamental to scientific progress and to maintaining public trust in ICMR led or ICMR funded research.

4. Definition

The CoI is a set of conditions where professional judgement concerning a primary interest, of application or decision of funding the research proposal tends to be unduly influenced by a secondary interest, financial or non-financial (personal, academic or political). The CoI can be at the level of researchers, EC members, institutions or sponsors. If CoI is inherent in the research application or decision-making process, "it is important to declare this at the outset and establish appropriate mechanisms to manage it" (ICMR, 2017).

4.1 Financial CoI

The CoI can be financial, such as receiving funding from organisations with an interest in the results, owning stocks related to the research, or accepting payments for consulting or speaking fees or having membership of Boards, Governing Bodies or Scientific Committees of funded institutions. Examples,

Equity Ownership in a Related Organisations

- A government scientist owns stock or stock options in a biotech company whose product is being evaluated in their lab.

Paid Consulting or Advisory Roles

- Providing compensated technical advice to a company that could benefit from your agency's funding decisions.

Intellectual Property (Royalties & Licensing Income)

- Receiving royalties from a patent that is licensed to a private firm whose technology is being evaluated by the researcher's agency.

Sponsored Travel or Gifts

- Accepting paid travel, lodging, or honoraria from a company whose work is regulated, funded, or reviewed by the agency.

Outside Employment

- Holding a part-time paid position at a private firm conducting research in the same field as your government role.

Family Financial Interests

- A spouse or dependent child owning significant stock in a company that receives agency grants.

Participation in Funding or Procurement Decisions

- Serving on a technical evaluation panel for proposals submitted by a company that pays you consulting fees.

Startup Formation Based on Government Research

- Founding a startup to commercialize government-funded research while still involved in funding decisions related to similar technologies.

4.2 Non-financial CoI

Non-financial conflicts can include personal relationships, professional competition/ rivalries, or beliefs that might influence research outcomes. These are indicative and not exclusive. These non-financial interests (personal, academic, or political factors) can potentially influence an individual's professional judgment and decision-making process. Personal includes preferential decision in favour of near relative[#], students or colleagues. Academic conflicts can involve the drive for prestige, professional advancement, or the pressure to publish positive research results. Political conflicts may arise when institutional affiliations or loyalties influence research outcomes or decision-making or if there is pressure from authorities regarding approvals/ budget considerations. Examples,

Personal Relationships

- Reviewing a grant application submitted by a departmental colleague.
- Supervising or evaluating a spouse, partner, sibling, or other relative (nepotism).
- Serving on a hiring panel where a former student is a candidate.
- Overseeing a grant involving an organisation run by a close personal associate.

Even without financial gain, the personal relationship can bias judgment.

Professional Rivalries or Alliances

- Reviewing a grant proposal from a long-standing academic competitor.
- Participating in a funding decision involving a researcher with whom you have had a public scientific dispute.
- Evaluating work from a collaborator with whom you have recently co-authored papers.

Professional loyalties or rivalries can influence objectivity.

Career Advancement Interests

- Promoting a specific research direction because it supports your own publication record or reputation.
- Influencing program priorities to benefit your research group's standing.
- Supporting a policy decision that strengthens your own future promotion prospects.

Intellectual or Ideological Bias

- Participating in regulatory decisions involving research aligned with a publicly stated advocacy position.
- Reviewing projects related to controversial topics where you have publicly taken a strong stance.
- Allowing personal moral or political beliefs to affect evaluation of scientific merit.

Academic Commitments

- Reviewing grant proposals from a current collaborator or recent co-author.
- Serving on thesis committees while also participating in funding decisions affecting the same student.
- Evaluating institutional proposals from your former employer.

Institutional Conflicts

- Participating in funding decisions that benefit your own department or laboratory.
- Serving on a committee allocating shared resources where your own unit is an applicant.
- Advocating for institutional prestige over objective scientific assessment.

Access to Confidential Information

- Using privileged, non-public research information for professional advantage (e.g., publishing similar work before a reviewed proposal is funded).
- Informally sharing confidential proposal details with colleagues.

Dual Roles

- Acting as both regulator, grant manager, and researcher in the same subject area.
- Serving on a standards committee while leading research that would benefit from adoption of those standards.

5. Applicability

- The provisions of the Policy shall be followed by persons applying for and receiving funding from ICMR, reviewers of the proposals and members of Expert Committees, Project Screening Committees, Project Review Committees and Project Advisory Committees, etc. It will also be applicable to all ICMR employees including Programme Officers and Committee members/experts involved in the evaluation of proposals and decision-making process or fund granting/disbursement process, consultants and all other stakeholders involved in ICMR programmes.

- This Policy aims to minimize Actual, Perceived, and Potential Conflict of Interests in the present funding mechanisms of ICMR. Actual conflict of interest occurs when there is a genuine and current divergence between the interests of research integrity and the personal, professional, or organisational interests of an individual or group. Perceived conflict of interest exists when a third party could reasonably believe that a person's or organisation's interests may be improperly influencing research integrity, even if no actual conflict is present. Potential conflict of interest follows when a person or organisation has interests that could plausibly conflict with research integrity in the future. These situations require early action to reduce or prevent the risk of a future conflict.

6. Specifications as to what constitutes the CoI and to be declared

- An expert/programme officer/stakeholder working for or with ICMR does not act in ICMR's best interests because they have another interest that they prioritise over ICMR's interests (actual conflict of interest).
- An expert/programme officer/stakeholder working for or with ICMR has other interests that could reasonably be perceived, or give the appearance to other people, that they may not act in ICMR's best interests (even if they do act in ICMR's best interests) (perceived conflict of interest).
- An expert/programme officer/stakeholder working for or with ICMR has other interests which may improperly influence their capacity to act in ICMR's best interests in the future (potential conflict of interest).
- The applicant is a near relative# or family member (including, but not limited to, a spouse, child, sibling, or parent), or any individual involved in the decision-making process, including where any such individual has a direct or indirect influence, interest, or stake in the applicant's application.
- The applicant is a current or recent (within the past three years) employee or employer of a reviewer or committee member involved in the grant or award process.
- The applicant and the reviewer or committee member are from the same department.

- The reviewer or committee member is the head of the applicant's employing organization.
- The reviewer or committee member has a current or past professional association with the applicant (e.g., Ph.D. supervisor, mentor, collaborator, etc.).
- The reviewer or committee member contributed to the preparation of the applicant's research proposal.
- The applicant has co-authored research publications with the reviewer or committee member within the past three years (excluding corporate authorship like GBD studies).
- The applicant or the reviewer/committee member stands to gain financially, directly or indirectly, from the outcome of the proposal.
- The reviewer or committee member stands to gain personally from the acceptance or rejection of the proposal.
- The reviewer or committee member might not be able to provide an objective assessment of the proposal.

[#]The term "near relative" includes parents, siblings, children, spouse, grandparents and grandchildren ("The Transplantation of Human Organs Act, 1994")

7. Implementation

The ICMR would seek declaration of CoI from all external advisory experts/stakeholders which would be reviewed for determining the level and its acceptability. Experts must disclose on the Declaration of Interest (DoI) form any financial, professional, or other interests relevant to the work or meeting, *including any interests that could be affected by its outcome* (Annexure 1). Similarly, all Programme Officers/Officials would self-declare their conflict of interest (if any) under the supervision of the competent authority related to research proposal under consideration. An alternate officer will be deputed in such case. A self-regulatory approach is recommended for all stakeholders engaged in scientific research and management with respect to conflict-of-interest matters.

8. Confidentiality

The Reviewers and the Members of the Committee shall safeguard the confidentiality of all discussions and decisions taken during the process and shall refrain from discussing the same with any applicant or a third party, unless the Committee recommends otherwise and this may be duly recorded in the minutes. A confidentiality agreement may be got signed (Annexure 2).

9. Compliance

9.1 By Applicant to the Grant/Award

- The applicant must refrain from suggesting referees with potential CoI that may arise due to the factors mentioned in the specifications described above in Point No. 6.
- The applicant may mention the names of individuals to whom the submitted proposal should not be sent for refereeing, clearly indicating the reasons for the same.

9.2 By Reviewers/Committee Members/Stakeholders

- All reviewers shall submit a CoI statement, declaring the presence or absence of any form of CoI, every time a new set of proposals are reviewed.

- The reviewers shall self-declare the CoI and refrain from evaluating the proposals.
- All discussions and decisions regarding CoI shall be documented in the meeting minutes.
- The Committee Chairman shall have the authority to make decisions on all matters related to conflicts of interest.
- At the start of the meeting, the Committee Chairman shall request that all members to disclose any CoI related to the agenda items scheduled for discussion.
- Committee members must abstain from participating in the decision-making process and leave the room for any agenda item where a conflict of interest is identified or apparent. This shall be recorded in the meeting minutes.
- If the Chairman has a CoI, the Committee may appoint a temporary Chairman from among the remaining members for the duration of the discussion on the relevant proposal, with the decision made in consultation with the Committee's Member Secretary.
- Committee members, including the Chairperson, are expected not to seek funding from the Committee of which they are members. Any proposals submitted by a member shall be evaluated separately, outside the Committee, and any related conflict of interest shall be recorded in the meeting minutes.
- Any stakeholders associated with ICMR programmes/consultations/referrals/any other engagements shall duly self-declare the CoI to ICMR.

9.3 **By the Officers dealing with Programmes in ICMR**

- The Programme Officers must maintain confidentiality as detailed in Point No. 8 above.

- They should declare, in advance, if they are dealing with grant applications of a near relative# or colleague or collaborator (present/former) or thesis/ post-doctoral/PhD/MD/DM mentor or stands to benefit financially if the applicant proposal is funded. In such cases, the ICMR will allocate the grant applications to another Programme Officer.

10. **Disclosure and Management Measures**

- Managing CoI involves two essential steps: identifying and disclosing the conflict, and determining the appropriate action to avoid or mitigate its impact.

- The primary responsibility for identifying and disclosing a CoI rests with the individual concerned. Individuals have the most comprehensive understanding of their own personal, financial, and professional interests and are therefore best positioned to recognize when their official duties intersect with another interest.

- Disclosure should be made promptly to the appropriate person or authority. Transparency is always preferable to attempting to manage a conflict independently. However, disclosure alone is generally not sufficient. Once a conflict has been identified and disclosed, ICMR will carefully assess the seriousness of the conflict, the level of risk it presents, and the range and practicality of available mitigation options.

- The severity of the conflict will determine the strength of the response required. Practical considerations may also influence which mitigation measures are most

appropriate. Maintaining proper records of the relevant facts, including who assessed the conflict, the reasoning behind the decision, and the actions taken, supports accountability, transparency, and good governance.

10.1 For a) Applicant, and b) Reviewers/Committee Members/Stakeholders

For any breach of the code of conduct, a two- to three- member inquiry committee, including a least one external member, shall be constituted to evaluate the allegations that will result in a suitable action such as a warning/a ban/a debarment for three years for applying/receiving grants and becoming reviewer/member of committees of ICMR, engagement/collaboration/participation in ICMR programmes.

10.2 For Officers dealing with Programmes in ICMR

In the event of a suspected breach of the code of conduct, a two- to three- member inquiry committee, including at least one external member, shall be constituted to evaluate the allegations. The committee shall review the respondent's explanation, assess the credibility of evidence, determine the nature and extent of the misconduct, identify personnel involved, and recommend appropriate action, including any punitive or disciplinary measures, in accordance with the provisions of the CCS (Conduct) Rules, 1964

11. Final Appellate Authority

The competent authority shall designate officials for the implementation of this Policy.

The Director General (DG), ICMR, shall be the appellate authority in issues pertaining to CoI and matters concerning the decision-making process. The decision of DG, ICMR on these issues shall be final and binding. In cases of CoI with DG, ICMR, the decision of the Chairman, Scientific Advisory Board (SAB), ICMR, New Delhi, will be final and binding.

12. References

- Indian Council of Medical Research. *National ethical guidelines for biomedical and health research involving human participants*. New Delhi: ICMR; 2017.
- Ministry of Law, Justice and Company Affairs (Legislative Department). *The Transplantation of Human Organs Act, 1994*. New Delhi: Government of India; 1994 Jul 11.
- Government of India. *Central Civil Services (Conduct) Rules, 1964*. New Delhi: Government of India; 1964.
- Agence de Médecine Préventive. *Prevention of conflicts of interest in NITAGs: principles and guidance to implement conflict of interest management policy*. Paris: Agence de Médecine Préventive; 2017 Mar.
- National Institutes of Health. *NIH conflict of interest rules: information for reviewers of NIH applications and R&D contract proposals* [Internet]. Bethesda (MD): NIH; [cited 2026 Apr 13]. Available from: https://grants.nih.gov/grants/peer/NIH_Conflict_of_Interest_Rules.pdf
- UK Government. *Guidance: conflict of interest policy* [Internet]. London: Government of the United Kingdom; 2025 Oct [cited 2026 Apr 13]. Available from: https://www.gov.uk/government/publications/conflict-of-interest-policy/conflict-of-interest-policy

- Japanese Society of Public Health. *Policies and detailed rules regarding conflict of interest (COI) in public health research* [Internet]. Tokyo: JSPH; 2025 Mar [cited 2026 Apr 13]. Available from: https://www.jsph.jp/en/about/coi/
- World Health Organization. *Declaration of interests for WHO experts* [Internet]. Geneva: WHO; [cited 2026 Apr 13]. Available from: https://www.who.int/publications/m/item/declaration-of-interests-for-who-experts
- World Health Organization. *Confidentiality undertaking* [Internet]. Geneva: WHO; [cited 2026 Apr 13]. Available from: https://www.who.int/publications/m/item/declaration-of-interests---annex-c

Annexure-1

DECLARATION OF INTERESTS FOR ICMR EXPERTS*

ICMR's work on biomedical research requires the assistance of external experts who may have interests related to their expertise. To ensure the highest integrity and public confidence in its activities, ICMR requires that experts serving in an advisory role disclose any circumstances that could give rise to a potential CoI related to the subject of the activity in which they will be involved.

Name:	
Institution:	
Email:	

Date and title of meeting or work, including description of subject matter to be considered (if a number of substances or processes are to be evaluated, a list should be attached by the organizer of the activity):

Please answer each of the questions below. If the answer to any of the questions is "yes", briefly describe the circumstances on the last page of the form.

The term "you" refers to yourself and your immediate family members (i.e., spouse (or partner with whom you have a similar close personal relationship) and your children). "Commercial entity" includes any commercial business, an industry association, research institution or other enterprise whose funding is significantly derived from commercial sources with an interest related to the subject of the meeting or work. "Organization" includes a governmental, international or non-profit organization. "Meeting" includes a series or cycle of meetings.

**This form is adapted from Declaration of Interests for WHO Experts.*
https://www.who.int/publications/m/item/declaration-of-interests-for-who-experts

EMPLOYMENT AND CONSULTING

Within the past 3 years, have you received remuneration from a commercial entity or other organization with an interest related to the subject of the meeting or work?

1a Employment Yes☐ No☐

1b Consulting, including service as a technical or other advisor Yes☐ No☐

RESEARCH SUPPORT

Within the past 3 years, have you or has your research unit received support from a commercial entity or other organization with an interest related to the subject of the meeting or work?

2a Research support, including grants, collaborations, sponsorships, and other funding Yes☐ No☐

2b Non-monetary support valued at more than 20,000 INR overall (include equipment, facilities, research assistants, paid travel to meetings, etc.)

Support (including honoraria) for being on a speakers bureau, giving speeches or training for a commercial entity or other organization with an interest related to the subject of the meeting or work? Yes☐ No☐

INVESTMENT INTERESTS

Do you have current investments (valued at more than 1 Lakh INR overall) in a commercial entity with an interest related to the subject of the meeting or work? Please also include indirect investments such as a trust or holding company. You may exclude mutual funds, pension funds or similar investments that are broadly diversified and on which you exercise no control.

3a Stocks, bonds, stock options, other securities (e.g., short sales) Yes☐ No☐

3b Commercial business interests (e.g., proprietorships, partnerships, joint ventures, Board memberships, controlling interest in a company) Yes☐ No☐

INTELLECTUAL PROPERTY

Do you have any intellectual property rights that might be enhanced or diminished by the outcome of the meeting or work?

4a Patents, trademarks, or copyrights (including pending applications) Yes☐ No☐

4b Proprietary know-how in a substance, technology or process Yes☐ No☐

PUBLIC STATEMENTS AND POSITIONS (during the past three years)

5a As part of a regulatory, legislative or judicial process, have you provided an expert opinion or testimony, related to the subject of the meeting or work, for a commercial entity or other organization? Yes☐ No☐

5b Have you held an office or other position, paid or unpaid, where you represented interests or defended a position related to the subject of the meeting or work? Yes☐ No☐

ADDITIONAL INFORMATION

6a If not already disclosed above, have you worked for the competitor of a product that is the subject of the meeting or work, or will your participation in the meeting or work enable you to obtain access to a competitor's confidential proprietary information, or create for you a personal, professional, financial

or business competitive advantage? Yes☐ No☐

6b To your knowledge, would the outcome of the meeting or work benefit or adversely affect interests of others with whom you have substantial common personal, professional, financial or business interests (such as your adult children or siblings, close professional colleagues, administrative unit or department)? Yes☐ No☐

6c Excluding ICMR, has any person or entity paid or contributed towards your travel costs in connection with this ICMR meeting or work? Yes☐ No☐

6d Have you received any payments (other than for travel costs) or honoraria for speaking publicly on the subject of this ICMR meeting or work? Yes☐ No☐

6e Is there any other aspect of your background or present circumstances not addressed above that might be perceived as affecting your objectivity or independence? Yes☐ No☐

EXPLANATION OF "YES" RESPONSES: If the answer to any of the above questions is **"yes", check above and briefly describe the circumstances on this page. <u>If you do not describe the nature of an interest or if you do not provide the amount or value involved where relevant, the conflict will be assumed to be significant</u>.**

Nos. 1 - 4: Type of interest, question number and category (e.g., Intellectual Property 4.a copyrights) and basic descriptive details.	**Name of company, organization, or institution**	**Belongs to you, a family member, employer, research unit or other?**	**Amount of income or value of interest (if not disclosed, is assumed to be significant)**	**Current interest (or year ceased)**

Nos. 5-6: Describe the subject, specific circumstances, parties involved, time frame and other relevant details

CONSENT TO DISCLOSURE. By completing and signing this form, you consent to the disclosure of any relevant conflicts to other meeting participants and in the resulting report or work product.

DECLARATION. I hereby declare on my honour that the disclosed information is true and complete to the best of my knowledge.

Should there be any change to the above information, I will promptly notify the responsible staff of ICMR and complete a new declaration of interests form that describes the changes. This includes any change that occurs before or during the meeting or work itself and through the period up to the publication of the final results or completion of the activity concerned.

Date _____ Signature _____

Annexure-2

ICMR
INDIAN COUNCIL OF MEDICAL RESEARCH
Serving the nation since 1911

Confidentiality Undertaking*

(Should be sent with the invitation letter)

1. The Indian Council of Medical Research (ICMR), acting through its Institute/Centre _____, has access to certain information relating to _____, which information ICMR considers to be proprietary to itself or to parties collaborating with it (hereinafter referred to as "the Information").

2. The Undersigned, as a member of the _____ advisory meeting, group or committee (collectively referred to as the "the Advisory Process"), may have access to the Information in the course of his/her participation in the Advisory Process (whether at or in relation to Advisory Process meetings, internet-based collaborative workspaces, telephone conferences or otherwise).

3. ICMR is willing to provide the Undersigned the Information, or arrange for the provision of the Information to the Undersigned, for the purpose of performing his/her responsibilities in connection with the activities of the Advisory Process ("the Purpose"), provided that the Undersigned undertakes to treat the Information as confidential and proprietary, and to disclose it only to persons who have a need to know for the Purpose and are bound by like obligations of confidentiality and non-use as are contained in this Undertaking.

4. The Undersigned undertakes to regard the Information as confidential and proprietary to ICMR or parties collaborating with ICMR and agrees to take all reasonable measures to ensure that the Information is not used, disclosed or copied, in whole or in part, other than as provided in this Undertaking, except that the Undersigned shall not be bound by any such obligations if and to the extent he/she is clearly able to demonstrate that the Information:

   a) was known to him/her prior to any disclosure by or for ICMR to the Undersigned; or
   b) was in the public domain at the time of disclosure by or for ICMR to the Undersigned; or
   c) becomes part of the public domain through no fault of the Undersigned; or
   d) becomes available to the Undersigned from a third party not in breach of any legal obligations of confidentiality.

5. The Undersigned also undertakes not to communicate the deliberations and decisions of the Advisory Process to third parties except as agreed by ICMR.

6. If requested to do so, the Undersigned agrees to return to ICMR any and all copies of the Information.

**This form is adapted from Declaration of Interests for WHO Experts.*
https://www.who.int/publications/m/item/declaration-of-interests---annex-c

7. The obligations of the Undersigned shall survive the termination of his/her membership in the Advisory Process.

8. Any dispute relating to the interpretation or application of this Undertaking shall, unless amicably settled, be subject to a conciliation. In the event of failure of the latter, the dispute shall be settled by arbitration. The arbitration shall be conducted in accordance with the modalities to be agreed upon by the parties or, in the absence of agreement, with the UNCITRAL rules of arbitration. The parties shall accept the arbitral award as final.

Date _____ Signature _____

List of Abbreviations

CAR	:	Centre for Advanced Research
CCS	:	Central Civil Services
CoI	:	Conflict of Interest
DG	:	Director General
DoI	:	Declaration of Interest
ICMR	:	Indian Council of Medical Research
Ph.D.	:	Doctor of Philosophy
SAB	:	Scientific Advisory Board
SAC	:	Scientific Advisory Committee

List of Members

The "ICMR Conflict of Interest Policy" has been prepared by the following committee:-

1.	**Dr. Sanghamitra Pati** Addl. DG (IM), ICMR, New Delhi	Chairperson
2.	**Prof. Anand Krishnan** Centre for Community Medicine, AIIMS, New Delhi	Member
3.	**Prof. Bikash Medhi** Deptt. of Pharmacology, PGIMER, Chandigarh	Member
4.	**Dr. Roli Mathur** Scientist G & Head, Bioethics Unit, ICMR , New Delhi	Member
5.	**Dr. Bal Kishan Gulati** Scientist E, ICMR, New Delhi	Member-Secretary

The policy was prepared by the above committee and revised based on inputs received from **Dr. Alka Sharma**, Addl.DG (EM) and **Mrs. Manisha Saxena**, Sr.DDG(A), ICMR, New Delhi.