

Award Policies

The policies and position statements of The Wellcome Trust/DBT India Alliance ('India Alliance' or IA) are available on this page. These should be read in conjunction with the [Award conditions](#).

Researchers funded by the tobacco industry

The mission of the India Alliance is to establish and nurture talent of the highest international standards, in cutting-edge biomedical research in India, resulting in important scientific breakthroughs and applications to society. In view of the overwhelming evidence that use of tobacco is injurious to health, the India Alliance will not fund applications from individuals applying for, holding, or employed under a research grant from the tobacco industry.

Peer review and confidentiality

The use of independent peer reviewers (to obtain advice from experts knowledgeable in a research area) is an intrinsic part of the India Alliance decision-making process when deciding the activities, it chooses to fund.

Maintaining confidentiality in the peer review process is central to the India Alliance's approach because it considers, in line with a majority of scientific research funding organisations worldwide, that the best quality peer review is obtained when the referees can comment candidly, with the knowledge that their comments will be disclosed only to those directly involved in the decision-making process. In addition, the India Alliance maintains the confidentiality of the comments because, in most cases, they relate directly to the work of identifiable individual scientists. However, with the permission of the referees, the India Alliance usually feeds back non-attributed comments to applicants who have submitted full applications. This is particularly useful to those applicants who have not been successful, as the comments can assist them in understanding why their application was not supported and how improvements might be made to future applications.

Stem cell research

Researchers funded by the India Alliance who conduct stem cell research, are expected to do so according to high ethical standards and to comply with all applicable legal and regulatory requirements.

Research should be carried out in accordance to the Department of Biotechnology and Indian Council of Medical Research's Guidelines for Stem Cell Research and Therapy.

India Alliance funded researchers should deposit viable samples of human stem cell lines derived using India Alliance funding in an internationally recognised stem cell bank.

Stem cell research is funded on merit and scientific excellence after rigorous peer review.

Intellectual property and patenting

The mission of the India Alliance is to establish and nurture talent of the highest international standards, in cutting-edge biomedical research in India, resulting in important scientific breakthroughs and applications to society. This is the driving force behind all of India Alliance's charitable funding activities, and the basis for its policy on the protection and use of intellectual property rights. The aim of this policy is to provide a clear

statement for India Alliance Grantholders of its position on the protection and use of intellectual property through patents.

In developing this policy, the India Alliance has considered a wide range of issues, in particular the role of intellectual property rights in creating the best conditions for research and in translating that research into tangible healthcare benefits. The India Alliance supports the appropriate protection and use of intellectual property where this will maximise healthcare benefits and enable biomedical research to flourish.

In order for research advances to qualify for intellectual property protection, the legal criteria for patent protection must be fulfilled. This means that, to be patentable, the results of research must describe an invention that is:

- Novel, i.e. not described elsewhere before
- Non-obvious, i.e. involving a step sufficiently inventive that most people working in that field could not have predicted it
- Capable of industrial application, i.e. described in such a way that it can be made or used.

Patents, including those covering genes and their products, are no exception, and the India Alliance is supportive of these if there is sufficient information to indicate that the DNA sequences in question can be used to develop healthcare benefits. The India Alliance does not support the patenting of raw DNA sequences in the absence of such information.

The India Alliance is particularly concerned about patents and patent applications that are unreasonably broad and opportunistic, e.g. when there is limited functional data available to support those patent claims. The India Alliance may challenge such speculative patents if it believes that they are being applied for or used in ways that could be detrimental to research or limiting to the development of healthcare benefits.

Policy on intellectual property and patenting

- The India Alliance supports the appropriate protection and use of intellectual property rights (IPR) to maximise healthcare benefits and to enable fundamental biomedical research to flourish.
- While India Alliance will not receive any equity or revenue, it will require the Host Institution to also ensure that there is no inappropriate use of patents that is detrimental to scientific endeavor or to advances in healthcare. Please refer to [Award conditions](#) for further details.
- As such, the India Alliance supports the protection of research findings that meet the legal criteria for the filing of patents -that is, that findings should be novel, non-obvious (i.e. inventive) and capable of industrial application.
- The India Alliance believes that the basic DNA sequence of humans and other organisms should be placed in the public domain as soon as is practical, without any fees, patents, licences or limitations on use, giving free and equal access to all. Subject to this, the India Alliance is supportive of patents encompassing genes and their products when there is research data or information indicating that a particular DNA sequence has a utility such that the legal criteria for patenting can be met.
- All India Alliance Grantholders and their Host Institutions are required to work with the India Alliance in relation to IPR arising from this funding in accordance with the [Award conditions](#).
- The India Alliance may challenge the inappropriate use of patents that it considers to be detrimental to scientific endeavour or to advances in healthcare.
- Founding scientists may also receive fixed amounts of cash or equity (or both) in consideration of the transfer of intellectual property to a commercial organisation, subject to compliance with the Award conditions and the policies of the institution.

Policy on evaluation and monitoring of funded research (Progress Review)

India Alliance considers constant monitoring and evaluation of its funded research, individuals, institutions and activities very seriously and it has put in place defined processes for periodic evaluation. The mid-term review will evaluate the Grantholder's progress during the tenure of their India Alliance Fellowship. The continuation of India Alliance funding after the third year of the Fellowship/Grant will be contingent upon a satisfactory review of the progress made during the first half. India Alliance will continue to review the progress in the subsequent years of the Fellowship/Grant. India Alliance reserves the right to review the status of funding at any stage of the award based on the progress made by the Grantholder.

A Committee designated by India Alliance would review the Grantholder's progress based on the details presented in the annual progress report and during the Annual Fellows Meeting.

The following structure is used to decide attendance at the Annual Fellows Meeting.

First year: It is mandatory for Grantholders in the first year of their Fellowship/Grant to attend and present a plan of work and early data (if any).

Third year: It is required that Grantholders in the third year will attend the meeting and share their work with the Committee, which will carefully review their progress and provide an appropriate feedback. Whether an individual Grantholder will be invited to make an oral or poster presentation will be decided after a review of their progress reports in advance of the meeting.

Fifth year: It is mandatory for all Grantholders to make an oral or poster presentation at the Annual Fellows Meeting in the last year of their funding. This would describe all the work done under the award.

Others: Though it is not mandatory, Grantholders in the second and fourth years are encouraged to attend the meeting but will not present their work. However, if a Grantholder in these years wants to report some exciting findings, he/she may contact the office separately. Alternatively, India Alliance can use its discretion to invite a Grantholder in these years if there are concerns about his/her progress or if there are matters that require discussion.

India Alliance reserves the right to make amendments to this policy to accommodate the changing requirements of the review process.

Research Training Fellowship for Clinicians: The Fellows' progress is reviewed after nine months of the start of the Fellowship. Consequently, continuation of the India Alliance funding after the first year of the Fellowship will be contingent upon a satisfactory review of the progress at that stage. The Research Training Fellows will be required to attend all the Fellows' Meetings during the tenure of their funding.

Grantholders' relationships with commercial organisations

The India Alliance is a public charitable trust established under the laws of India that provides support for high quality biomedical research and seeks to promote both basic and applied research. The India Alliance wishes to ensure that useful results of this research are applied for public benefit (i.e. the research should give adequate public benefit, with only incidental private benefit). The India Alliance recognises the importance of protecting and exploiting intellectual property arising from research as a means of achieving this public benefit. Accordingly, the India Alliance views it as desirable to encourage, where appropriate, scientifically productive relationships between its Grantholders and commercial organisations. At the same time, it wishes to ensure that the intellectual integrity of Grantholders and their freedom to carry out curiosity-driven research are not compromised by such relationships.

Definitions

- Grantholder, Grantholders and Fellows: The “Lead Applicant” as specified in the Fellowship/Grant application and as specified in the Award Letter.
- ‘Consultancy’ means any compensated service for or on behalf of a commercial organisation, including membership of a scientific advisory board or service as an expert witness, but does not include work undertaken for a publisher of academic journals or textbooks as an expert reviewer or author.
- ‘Intellectual property’ is defined in the Award Conditions.
- ‘Equity’ means shares, share options, warrants, convertible debt or any other contractual or other right to acquire shares or options as an owner, proprietor, partner or beneficiary, or a beneficial interest in any of the foregoing.
- ‘Host Institution’ means the university, institution or other body at which some or all of the research funded by India Alliance will be carried out or which employs the Grantholder or Grantholders.

Policy on consultancies and directorships

1. Grantholders may serve as consultants to commercial organisations. Consultancy is limited to the provision of advice and the exchange of ideas and must not include research or supervision of research. Consultancy must not enable a commercial organisation to gain access to unpublished data, findings or conclusions from Grantholders that would give an unfair advantage to that organisation over its competitors in access to the India Alliance-funded research.
2. Subject to the policies of their Host Institution, Grantholders may serve as non-executive directors of commercial organisations but may not serve as executive directors, except in exceptional circumstances. A Grantholder wishing to accept an executive directorship would have to relinquish all forms of ongoing India Alliance support, or would have to obtain prior written permission from the India Alliance for the India Alliance-funded research to continue with appropriate safeguards to ensure that the research would be brought to a satisfactory conclusion.
3. Grantholders in receipt of salary support from the India Alliance must ensure that their time commitments to commercial organisations and other non-research activities are compatible with the policies of the Host Institution and any conditions in the India Alliance’s Award Letter.
4. The terms of each consultancy or directorship must be set out in a written agreement between the Grantholder and the commercial organisation. Before entering into a proposed consultancy or directorship, the Grantholder is required to obtain the prior approval of the Host Institution, which is expected to review the proposed consultancy or director’s service agreements offered to the Grantholders and ensure that the agreements are consistent with the policies of the Host Institution, this policy and paragraph 9 of the Award Conditions (‘Intellectual property and commercial activities’).
5. Where Grantholders are to be involved in relationships with commercial organisations, the arrangements for any transfer of intellectual property arising from the India Alliance-funded research must be in accordance with paragraph 9 of the Award Conditions and the policies of the Host Institution.

Disclosure and management of conflicts of interest

6. Grantholders holding consultancies in, or directorships of, commercial organisations are required to make a declaration of interests to their Host Institution. Should no mechanism be in place to do so, the Grantholder should notify the India Alliance.

7. The compensation of Grantholders for the work they undertake for commercial organisations must be compatible with the rules and regulations of their Host Institution. Unless the rules and regulations of their Host Institution dictate otherwise, compensation may include fixed amounts of cash or equity (or both).

8. Grantholders must disclose to their Host Institution (a) benefits in cash and/or (b) any benefits in equity, received either as compensation for work undertaken for a commercial organisation, or in consideration of the transfer of intellectual property.

9. Grantholders holding equity in a commercial organisation must make a declaration of their interests to the Host Institution if they, together with members of their immediate family, hold, control or manage, directly or indirectly, (a) any level of equity in an unlisted company, or (b) equity in a listed company in excess of 1 per cent of that company's equity interest. 'Immediate family' includes spouse or partner; minor children; and adult children (but only in so far as the Grantholders have knowledge of the interests of the adult children).

10. Grantholders must notify their Host Institution in the event of any substantial upward or downward revision in the level of compensation received or the percentage or value of their equity interests, such as changes resulting from a professional financing round or the listing of the equity of the commercial organisation.

11. The Host Institution may require, at its discretion, that lower levels of cash or equity holdings (or both) should be disclosed.

12. Applicants for India Alliance funding will be required to indicate within the Grant application form whether they have any consultancies or equity holdings in, or directorships of, commercial organisations that might have an interest in the results of the proposed research. Should they be successful in their application, confirmation may be sought that they comply with the policies of their Host Institution or any India Alliance requirements (including this policy, the Award Conditions and the Award Letter).

Responsibility for managing conflicts of interest

13. The India Alliance does not directly employ researchers, but funds them through Host Institution. Therefore, the Host Institution is required to have a policy statement covering conflicts of interest and to manage any conflicts of interest arising from disclosures made to it by Grantholders because of their involvement with commercial organisations. The India Alliance may review such policy statements as part of its organisational eligibility checking procedures. It should be noted that if the policy statement of an applying organisation is not considered to be compatible with the India Alliance's policy, or if the organisation lacks the means to monitor or manage the policy, the organisation will be deemed to be ineligible for funding by India Alliance.

14. In managing a perceived or actual conflict of interest, it is the responsibility of the Host Institution to ensure that the India Alliance will not be in breach of Indian charity law or regulation because of the relationship of a Grantholder with a commercial organisation. In the event of any doubt, the Grantholder should decline the Grant. In particular, the Host Institution should act to ensure that the useful results of the India Alliance-funded research are applied for the public benefit, with only incidental private benefit. This might involve requiring a Grantholder to relinquish direct control over some, or all, of the assets he or she holds in a commercial organisation or requiring the level of compensation offered to the Grantholder to be capped.

15. The India Alliance reserves the right to decide not to proceed with an application or to terminate an award where a Host Institution is unable to comply with any India Alliance requirements (including this policy, the Award Conditions and the Award Letter).

16. Where the Host Institution has a concern about the commercial relationships of a Grantholder, it should seek to rectify that concern. At its discretion, the Host Institution may approach the India Alliance for advice.

17. In cases where there has been a breach of the policies of either the Host Institution or India Alliance, India Alliance should be informed as soon as possible about the issues identified and the actions taken.

18. India Alliance reserves the right at any time to require Host Institution or Grantholder or any individuals who are seeking India Alliance funds to provide to India Alliance current information about consultancies, directorships and equity holdings covered by this policy, copies of all relevant documentation, copies of the Host Institution's policies and details of the Host Institution's monitoring procedures.

19. India Alliance reserves the right to review the decisions taken by a Host Institution in managing conflicts of interest of Grantholders in order to judge whether those decisions could have an adverse effect on India Alliance's compliance with relevant law or regulation or India Alliance's activities or interests.

20. To the extent permissible by law or regulation, all information provided to India Alliance in order to comply with this policy is treated as confidential.

Policy on data management and sharing

1. India Alliance wishes to ensure that the outputs of the research it funds, including research data, are managed and used in ways that maximise public benefit. The India Alliance considers that the benefits gained from research data will be maximised when they are made widely available to the research community as soon as feasible, so that they can be verified, built upon and used to advance knowledge.

2. The guiding principles underlying the India Alliance Award Conditions are that:

- Research funded by the India Alliance is charitable in nature (i.e. gives adequate public benefit with only incidental private benefit) and is not constrained by commercial or other interests of the Grantholder/researcher.
- Discoveries, inventions and other knowledge arising from India Alliance-funded research are made freely available to the wider scientific community (publication can reasonably be delayed, allowing for protection of any intellectual property).

3. In support of this position the India Alliance expects its Grantholders to maximise the availability of research data with as few restrictions as possible.

4. Therefore, the India Alliance regards it as good research practice for all researchers to consider at the research proposal stage how they will manage and share the data they will generate.

5. In specific cases where applications for India Alliance funding involve the creation or development of a resource for the research community as the primary goal, or involve the generation of a significant quantity of data that could potentially be shared for added benefit, the India Alliance will:

- require that the applicants provide a data management and sharing plan as part of their application
- review these data management and sharing plans, including any costs involved in delivering them, as an integral part of the funding decision.

6. In addition to the responsibilities of those generating data, the India Alliance believes that data sharing for the benefit of the research community as a whole will only proceed if those using the data also adopt good research practice. In recognition of the contribution of the researchers and teams generating data, the India Alliance expects all users of data to acknowledge the sources of their data and abide by the terms and conditions under which they accessed the original data.

Policy on access to bioinformatics resources

For the purposes of this policy statement, the term 'Bioinformatics Resource' is intended to mean a resource comprising databases of biological data and/or analytical tools for the interpretation of such data.

The terms of access to some bioinformatics resources can include restrictions on the use and publication of data and intellectual property that are incompatible with India Alliance Award Conditions.

Host Institutions and their India Alliance-funded Grantholders should therefore ensure that when assessing the scientific need to access a Bioinformatic Resource:

- They consider whether there are any freely available resources in the public domain which would meet that scientific need.
- Where access to a Bioinformatics Resource is necessary, they do not enter into any access agreements that impose restrictions on the use and publication of data and intellectual property that are incompatible with the India Alliance Grant Conditions.

Specifically:

- 1) The India Alliance considers that it is the responsibility of Host Institutions to enter into any access agreements to Bioinformatics Resources on behalf of their India Alliance-funded Grantholders.
- 2) Any organisation in receipt of India Alliance funding, which enters into an agreement to access a Bioinformatics Resource, must ensure that the terms of this agreement do not compromise its ability, or the ability of its India Alliance-funded Grantholders, to satisfy the India Alliance Award Conditions, in particular with respect to the use and/or publication of data and intellectual property.
- 3) The India Alliance will consider requests for funding the costs of subscriptions to bioinformatics resources only where applicants can demonstrate clearly that the scientific case for utilising these offers a clear advantage over any comparable resources in the public domain, and that the terms of their access are compatible with the India Alliance Grant Conditions.
- 4) Where there is any uncertainty, the India Alliance should be consulted.

Policy on open and unrestricted access to published research

The main output of the research funded by the India Alliance is new ideas and knowledge, which the India Alliance expects its Grantholders to publish in high-quality, peer-reviewed journals.

The India Alliance believes that maximising the distribution of these papers - by providing free, online access - is the most effective way of ensuring that the research it funds can be accessed, read and built upon. In turn, this will foster a richer research culture.

The India Alliance therefore supports unrestricted access to the published output of research as a fundamental part of its charitable mission and a public benefit to be encouraged wherever possible.

With effect from 01 September 2019, India Alliance open access policy is changing.

Specifically, the India Alliance:

- Expects authors of research papers to maximise the opportunities to make their results freely and openly available.
- Requires electronic copies of any research papers that have been accepted for publication in a peer-reviewed journal, and are supported in whole or in part by India Alliance funding, to be made available through Europe PubMed Central (Europe PMC) as soon as possible and by six months of the journal publisher's official date of final publication.
- Expects Grantholders to select publishing routes that ensure that their work is immediately available on publication. With India Alliance's membership of Europe PMC, the Grantholders are mandated to follow the "green route" wherever possible. "Gold" open access should be followed only in cases where the journals or publishers have a non-compliant open access policy or wherein "green" open access is not possible. Also, in situations where papers will automatically become openly accessible within or just after 6 months, the Grantholders are expected not pay open access charges to make it available immediately and ensure that it so happens immediately after 6 months from the date of publication. India Alliance will not reimburse extra open access charges for such publications.
- Requires - authors and publishers to license research papers such that they may be freely copied and re-used (for example for text and data-mining purposes), provided that such uses are fully attributed.
- Expects - its Grantholders to also comply with the prevalent open access policies in force in India. Please see the [DBT/DST Policy](#).
- Affirms the principle that it is the intrinsic merit of the work, and not the title of the journal in which an author's work is published, that should be considered in making funding decisions.

For further details please read our Award Conditions.

Policy on the use of animals in research

All research funded by the India Alliance must be fully compliant with the law and all researchers and facilities must have the appropriate regulatory approval. It is the responsibility of the Host Institution to ensure that India Alliance-funded research that involves the use of animals complies at all times with the relevant laws and regulation in the host country. The relevant Indian standards can be found on the [Government of India Ministry of Environment and Forests website](#).

The India Alliance expects that, as well as being compliant with all local legislation and ethical review procedures, any research involving the use of animals is carried out in the spirit of UK legislation, which the India Alliance considers to provide an appropriate international standard for research involving the use of animals. Information about the code of practice for the housing and care of animals under UK legislation can be found on the [Home Office website](#).

In addition to compliance with the legislation, all India Alliance funded research involving animals is assessed by independent peer reviewers who are asked to ensure that the use of animals in the research is necessary and relevant. In all animal experiments supported by the India Alliance, the [principles of the 3Rs](#) (Replacement, Refinement and Reduction) apply.

Bioterrorism and biomedical research policy statement

The India Alliance endorses the position statement on bioterrorism and biomedical research published by the Wellcome Trust (<https://wellcome.ac.uk/sites/default/files/wtp059491.pdf>).

Policy on Human participants in research

The India Alliance expects all work involving human participants to be undertaken in accordance with the highest ethical standards. All the research involving human participants should be conducted in accordance with the four basic ethical principles, namely autonomy (respect for person / participant), beneficence, non-maleficence (do no harm) and justice. India Alliance-funded Grantholders are responsible for ensuring they are aware of the issues surrounding the use of human subjects in research, comply with relevant legislation and have obtained all necessary approvals.

Institutional ethical committees and administrators should have mechanisms in place for protection of human participants, and assessment and analysis in case a serious adverse event is reported. Grantholders, in consultation with ethics committees, are responsible for determining the healthcare standards that would be provided to the participating human subjects.

The India Alliance will consider applications before the consent of the relevant ethics committee is obtained and before statutory procedures have been completed, but no research should begin until all relevant approvals have been granted. The India Alliance reserves the right to view relevant approval documents.

The India Alliance will not be liable in any manner for the Grantholder's non-compliance with any relevant legislations or rules or for any direct or indirect injury caused to volunteer or any third person during the course of or in relation to a clinical trial.

All trials must be registered before the intervention is started, in line with the [Declaration of Helsinki 2013](#). The ethical guidelines on use of human participants from Indian Council of Medical Research (ICMR) are available its [website](#).

Good research practice

The India Alliance expects its Grantholders to adhere to the highest standards of integrity. To facilitate this, it provides guidelines on good research practice and a statement on the handling of allegations of research misconduct. Organisations are expected to have in place their own published standards of good research practice and formal written procedures for the investigation of allegations of research misconduct.

1. Introduction

The India Alliance cannot be prescriptive about individual approaches taken by its Grantholders to solving particular research problems. But it expects organisations to ensure that an adequate structure exists to promote and promulgate good research practice, emphasising integrity and rigour in research, and to create a culture in which the following general principles can be understood and observed.

2. Integrity

- Grantholders should be honest in respect of their own actions in research and in their responses to the actions of other researchers. This applies to the whole range of research work, including experimental design, generating and analysing data, applying for funding, publishing results, and acknowledging the direct and indirect contribution of colleagues, collaborators and others.

- Plagiarism, deception or the fabrication or falsification of results should be regarded as a serious disciplinary offence.
- Grantholders are encouraged to report cases of suspected misconduct and to do so in a responsible and appropriate manner.
- Grantholders should declare and manage any real or potential conflicts of interest.

3. Openness

- While recognising the need for scientists to protect their own research interests, the India Alliance expects its Grantholders to be as open as possible in discussing their work with other scientists and with the public in order to help foster an informed public climate within which biomedical science can flourish.
- Once results have been published, the India Alliance expects its Grantholders to make available relevant data and materials to other researchers, on request, provided that this is consistent with any ethics approvals and consents that cover the data and materials and any intellectual property rights in them.
- The India Alliance recognises that publication of the results of research may need to be delayed for a reasonable period pending protection of intellectual property arising from the research. Any such periods of delay in publication should, however, be kept to a minimum.

4. Guidance from professional bodies

- Where available, the India Alliance expects its Grantholders to observe the standards of research practice set out in guidelines published by scientific and learned societies, and other relevant professional bodies.
- All Grantholders should be aware of the legal requirements that regulate their work.

5. Leadership and cooperation

- Heads of organisations and their senior colleagues should ensure that a research climate of mutual cooperation is created in which all members of a research team are encouraged to develop their skills and in which an open exchange of ideas is fostered.

6. Supervision

- Organisations should ensure that they provide an appropriate direction of research and supervision of researchers. Training in supervisory skills should be provided where appropriate.
- A code of responsibilities should be available for supervisors indicating, for example, the frequency of contact, responsibilities regarding scrutiny of primary data, and the broader development needs of research trainees.
- The need should be stressed for supervisors to supervise all stages of the research process, including outlining or drawing up a hypothesis, preparing applications for funding, protocol design, data recording and data analysis.

7. Training

- Organisations should have in place systems that allow students and new researchers to understand and adopt best practice as quickly as possible.
- All Grantholders should undertake appropriate training, for example in research design, regulatory and ethics approvals and consents, equipment use, confidentiality, data management, record keeping and data protection.

8. Primary data/samples

- At the start of the research programme and where relevant, there should be clarity on the ownership of:
 - Data and samples used or created in the course of the research
 - The results of the research
- Grantholders should keep clear and accurate records of the procedures followed and the approvals granted during the research process, including records of the interim results obtained as well as of the final research outcomes. This is necessary not only as a means of demonstrating proper research practice, but also in case questions are subsequently asked about either the conduct of the research or the results obtained.
- Data generated in the course of research should be kept securely in paper or electronic format, as appropriate. The India Alliance considers a minimum of ten years to be an appropriate period, but research based on clinical samples or relating to public health might require longer storage to allow for long-term follow-up to occur.
- Back-up records should always be kept for data stored on a computer.
- Organisations should have guidelines setting out responsibilities and procedures for the storage, use and disposal of data and samples (including compliance with the requirements of any ethics committee)

9. Ethical practice

9.1 Research involving human participants

- Approval is required from an appropriate ethics committee for all research funded by the India Alliance involving human participants or biological samples. Approval should also be sought from other appropriate regulatory bodies as required by the law of the land.
- Grantholders should ensure the confidentiality of personal information relating to the participants in research, and that the research fulfils all legal requirements.

9.2 Research involving animals

- Research involving animals should have approval through the appropriate ethical review process and must be fully compliant with all local legislations and rules.
- Grantholders should consider, at an early stage in the design of any research involving animals, the opportunities for reduction, replacement and refinement of animal involvement (the three Rs).

9.3 Risks of research misuse

- In progressing their scientific investigations, Grantholders should actively consider any risks that their research will generate outcomes that could be misused for harmful purposes. Where such risks exist, they should seek advice and take active steps to minimise them.
- Organisations should have in place mechanisms to ensure that risks of misuse associated with ongoing research programmes are identified and managed, and to provide advice to the researchers that they employ on these issues.

10. Publication practice

- Results should be published in an appropriate form, usually as papers in refereed journals, with copies being made available Europe PubMed Central (Europe PMC) as soon as possible and within or immediately after six months of the journal publisher's official date of final publication. For more details please refer to Policy on open and unrestricted access to published research.
- Anyone listed as an author on a paper should accept responsibility for ensuring that he/she is familiar with the contents of the paper and can identify his/her contribution to it. The practice of honorary authorship is unacceptable.
- The contributions of formal collaborators and all others who directly assist or indirectly support the research should be properly acknowledged.
- To assist the India Alliance in tracking the outputs of research to which it has contributed either wholly or in part, the India Alliance's contributions must be acknowledged in proper format in all publications.

Policy on handling allegations of research misconduct and other misconduct

India Alliance is committed to keeping highest legal and ethical standards and expects all staff/employees, fellows and other persons representing it or acting on its behalf to uphold this commitment. In accordance with this commitment, it has adopted the following policies, which are applicable to all Trustees, management, staff/employees, grant holders/fellows, representatives and persons authorized to deal in the name of India Alliance ("**India Alliance Associates**" or "**IA Associates**").

The India Alliance identifies integrity, openness and partnership as key values; this statement has been produced and is intended to be applied in line with those values. The expectation is that the necessity to invoke these procedures would be rare but that by following these general principles the process of investigating allegations of research misconduct will be a fair process that protects the interests of all the parties involved.

Throughout this statement:

- 'CEO' means the Chief Executive Officer of the India Alliance
- 'COO' means the Chief Operating Officer of the India Alliance
- 'Organisation' means any organisation in receipt of India Alliance funds
- 'The India Alliance' means the Wellcome Trust/DBT India Alliance, a public charitable trust established under the laws of India that provides support for high-quality biomedical research and seeks to promote basic and applied research.
- 'Grantholder(s)' or 'Fellow(s)' means recipients of India Alliance funding, including salaried researchers and non-India Alliance-salaried researchers in receipt of funds in any form from the India Alliance in order to advance their research.

1. Definitions of research misconduct and other misconduct

1.1 Research misconduct is defined as:

The fabrication, falsification, plagiarism or deception in proposing, carrying out or reporting results of research or deliberate, dangerous or negligent deviations from accepted practices in carrying out research. It includes failure to follow established protocols if this failure results in unreasonable risk or harm to humans, other vertebrates or the environment and facilitating of misconduct in research by collusion in, or concealment of, such actions by others. It also includes intentional, unauthorised use, disclosure or removal of, or damage to,

research-related property of another, including apparatus, materials, writings, data, hardware or software or any other substances or devices used in or produced by the conduct of research.

It does not include honest errors or honest differences in the design, execution, interpretation or judgement in evaluating research methods or results or misconduct unrelated to the research process. Similarly, it does not include poor research unless this encompasses the intention to deceive.

1.2 Bribery and Money Laundering

IA will not tolerate money laundering, bribery, kickbacks, or corruption of any kind, directly or through third parties, whether or not explicitly prohibited by this policy or by law. IA Associates are not permitted to give or offer anything of value (including gifts, hospitality, or entertainment) to anyone for the purpose of improperly obtaining or retaining a business advantage. Similarly, India Alliance Associates may not solicit or accept such improper payments or involve in money laundering.

Responsibilities

India Alliance Associates must conduct their activities in full compliance with this policy and any applicable anti-corruption and money laundering laws, including but not limited to the Prevention of Corruption Act, 1988 (“PCA”). The policy is to ensure that there is no violation of the PCA or other applicable anti-corruption or money laundering laws and any provision of this policy by the India Alliance Associates.

Under this policy, India Alliance Associates are not permitted to give or offer anything of value, directly or indirectly, to any Public Servant (as defined under the PCA and will have the same meaning through the policy) or any commercial party for the purpose of improperly obtaining or retaining a business advantage, or involve in money laundering.

For purposes of better understanding this policy, “anything of value” shall broadly be interpreted to include cash, gifts to family members, forgiveness of a debt, loans, personal favors, entertainment, meals and travel, political and charitable contributions, business opportunities and medical care, among other items. Simply put, bribes, kickbacks or similar payments are never permitted, whether made to a public servant or to customers, investors, clients or other private parties. Similarly, India Alliance Associates may not solicit or accept such payments.

The policy does not form part of the contract of employment or grant award (except and to the extent that a policy or procedure is implied by law) and can be withdrawn, amended or replaced at any time.

1.3 Policy on Harassment and Bullying

The India Alliance is committed to providing a safe and productive working environment, where all India Alliance Associates are treated with dignity and respect.

Accordingly, the India Alliance will not condone any form of harassment. Harassment can include bullying, intimidation or other forms of behaviour that can lead to victimisation, and can be on the grounds of gender, marital status, sexual orientation, race, colour, ethnic origin or nationality, religion or belief, disability or age. Such behaviour may be unlawful and can have long-term effects on the morale and well-being of individuals.

This policy covers all India Alliance Associates. It applies not only to interaction whilst at the Institution office and premises, but also extends to time spent out of the office whilst on business and at social events during the course of their employment or grant award.

The policy does not form part of the contract of employment or grant award (except and to the extent that a policy or procedure is implied by law) and can be withdrawn, amended or replaced at any time.

1.4 Policy on Prevention on Sexual Harassment (POSH)

India Alliance is committed to creating a safe and healthy working environment. India Alliance believes that all individuals have the right to be treated with dignity and shall strive to create a workplace which is free of Sexual Harassment. Sexual Harassment at the workplace or any other place if involving an India Alliance Associate is a grave offence and is strictly prohibited and punishable by law.

India Alliance approaches any form of Sexual Harassment with zero tolerance. IA does not in any manner support or condone an India Alliance Associate who sexually harasses any other person.

1.5 Whistle Blower Policy

India Alliance has endorsed the provisions set out below to ensure that India Alliance Associates are not disadvantaged if they wish to raise legitimate concerns regarding their workplace.

India Alliance is committed to the highest standards of integrity, openness and probity and this policy provides a mechanism by which India Alliance Associates can voice their concerns in a responsible and effective manner.

The policy does not form part of the contract of employment or grant award (except and to the extent that a policy or procedure is implied by law) and can be withdrawn, amended or replaced at any time.

Scope of Policy:

The aim of this policy is to assist India Alliance Associates (“Whistle Blower”) should they believe they have discovered serious malpractice, wrongdoing or impropriety, to disclose this information internally without fear of reprisal.

It is intended to cover the disclosure of concerns, which are in public interest and which may, at least initially, require to be investigated separately but might then lead to action through other procedures (for example, the disciplinary procedure, criminal prosecution, etc). Besides the ones mentioned earlier these disclosures may include:

- Bribery, corruption and money laundering
- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or statutes,
- Endangering the health and safety of any person or the environment
- Criminal activity or breaches of civil law
- Unethical behaviour or improper conduct
- Deliberate attempts to conceal any of these

The policy is not designed to question financial or business decisions taken by the IA nor may it be used to reconsider any matters, which have already been addressed under harassment, grievance, complaint, disciplinary or other relevant procedures.

Safeguards:

This policy is designed to offer protection to the Whistle Blower who discloses concerns, provided the disclosure is made: (a) in good faith; (b) in the reasonable belief that it tends to show malpractice or impropriety; and (c) to the appropriate person detailed in this policy.

Confidentiality:

The IA will treat all disclosures in a confidential and sensitive manner. The identity of the Whistle Blower may be kept confidential if it does not hinder or frustrate any investigation. However, in using the procedure, the

Whistle Blower should be aware that the investigation process may, by necessity, reveal the source of the information and the Whistle Blower should be willing to provide a statement as part of the evidence required.

Anonymous Allegations:

The Whistle Blowers are encouraged to put their name to any disclosures they make since concerns expressed anonymously appear much less credible. Anonymous disclosures may be considered at the discretion of the IA. In exercising this discretion, the factors to be taken into account will include: (a) the seriousness of the issues raised; (b) the credibility of the concern; and (c) the likelihood of confirming the allegation from other sources.

Untrue Allegations:

If the Whistle Blower is an IA Associate, who happens to make an allegation in good faith, which is subsequently not confirmed by an investigation, no action will be taken against that person. In making a disclosure, the Whistle Blower is expected to exercise due care in ensuring the accuracy and validity of the information. If an IA Associate makes malicious or vexatious allegations, and particularly if these are persistently made, then further action (including disciplinary action) may be taken, if he is a staff member or appropriate recommendations will be made to the relevant organisation.

Procedures for Making a Disclosure:

Details of the disclosure should be forwarded as follows:

- In the first instance the disclosure should be forwarded to the whistleblower@indiaalliance.org, or to the COO or where the disclosure is in any way related to his/her actions, to the CEO.
- Should the disclosure relate to the actions of the CEO, it should be forwarded to the Trustees.
- Where the disclosure relates to the actions of a Trustee or the Board of Trustees, it should be referred to the stakeholders of the IA.

2. Responsibilities of the organization

2.1 The India Alliance considers it the responsibility of the organisation to investigate all allegations of misconduct made against its staff and awardees. Findings of misconduct may be matters for consideration under the organisation's disciplinary procedures.

2.2 Organisations will need to give consideration to the procedures that will apply to visiting researchers while based in the organisation and the organisation's staff while based in another organisation.

2.3 It is the responsibility of the organisation to inform the CEO/COO, in confidence, at the earliest opportunity, about allegations of serious research misconduct/other misconduct that concern Grantholders where it seems that there are reasonable grounds to believe that the allegation may be substantiated on investigation. It is at the discretion of the organisation to determine what constitutes 'serious misconduct'. The organisation is also responsible for informing the CEO/COO of the outcome of any such investigation.

2.4 It is the responsibility of the organisation to inform the CEO/COO, in confidence, of all instances of research misconduct/other misconduct involving Grantholders that have resulted in the allegations being substantiated.

2.5 The organisation should have in place a policy statement relating to the treatment of Whistle Blowers, including a clear statement that research misconduct is taken seriously in the organisation and that any member of staff raising bona fide concerns can do so confidentially, and without fear of suffering any detriment. The statement should include a clear indication of the procedures in which such bona fide concerns by staff may be brought to the attention of a designated individual within the organisation.

3. Principles for investigation by organisations of allegations of research or other misconduct

Each organisation must have in place formal written procedures for dealing with allegations of research misconduct against its staff and students. Organisations should, where appropriate, take legal advice on implementing these procedures to ensure that the procedures comply with all legal obligations for the conduct of such investigations from time to time in force.

Organisations should endorse the following principles when implementing these procedures:

- The responsibilities of those dealing with the allegation should be clear and understood by all interested parties.
- Measures should be in place to ensure an impartial and independent investigation and to ensure that line management obligations or other interests of those dealing with the allegation do not conflict with these procedures.
- Those undertaking research at the organisation should be contractually obliged to participate in and comply with the procedure.
- The organisation should consider the confidential nature of the investigation and how to safeguard the rights to confidentiality of the interested parties.
- All interested parties should be informed of the allegation at an appropriate stage in the proceedings.
- Anyone accused of misconduct should have the right to respond.
- A policy should be in place to ensure that no employee who makes an allegation in good faith against another employee shall suffer a detriment, but equally that disciplinary procedures are in place to deal with malicious allegations.
- The allegation should be dealt with in a fair and timely manner.
- Proper records of the proceedings should be kept.
- The outcome should be made known as quickly as possible to all interested parties.
- Anyone found guilty of misconduct should have the right to an appeal.
- Appropriate sanctions and disciplinary procedures should be in place for cases when the allegation is upheld.
- If appropriate, efforts should be made to restore the reputation of the accused party if the allegation is dismissed.

4. Receipt of allegations at the India Alliance

The India Alliance recognises that there may be instances where an allegation of research misconduct or any other misconduct is made directly to a member of the India Alliance's staff or the CEO/COO rather than to an individual within the organisation. In such instances, the CEO/COO will contact an appropriate individual at the organisation and the organisation will then be responsible for taking suitable action in line with its formal written procedures for handling allegations of any form of misconduct.

5. Investigations by the India Alliance

As stated above, it is the organisation's responsibility to investigate allegations of research misconduct or any other misconduct made against its staff and students and this would be the India Alliance's preferred course of action in most cases. In exceptional cases, however, the India Alliance may wish to undertake its own

investigation into alleged cases of research misconduct that concern Grantholders (for example where the India Alliance's reputation is at risk or where the India Alliance is dissatisfied with the investigation undertaken by the organisation). Generally, any investigations by the India Alliance would only be undertaken following consultation between the CEO/COO and the appropriate representative(s) of the organisation.

6. Sanctions

If the organisation or the India Alliance determines that the allegation of research misconduct is substantiated, the India Alliance may consider appropriate sanctions. These may include, but are not restricted to:

- A letter of reprimand
- The withdrawal of funding
- Requiring the withdrawal or correction of pending or published abstracts and papers emanating from the research in question
- Changes to the staffing of the particular project
- Special monitoring of future work
- Barring the Grantholder from applying for India Alliance funds for a given period
- Repayment of grant plus interest at the India Alliance's discretion
- Discussion with the organisation on the implementation of appropriate disciplinary procedures.

At all times, in line with its Award conditions, the India Alliance reserves the right to withdraw funding with immediate effect.

7. Indemnity

The Grantholder and Host Institutions will indemnify, defend and hold harmless India Alliance, its trustees, employees and agents ("Indemnified Parties") from and against any and all demands, claims, actions, suits, losses, damages (including property damage, bodily injury and wrongful death), arbitration and legal proceedings, judgments, settlement or costs or expenses (including reasonable attorneys' fees and expenses) (collectively, "Claims") arising out of or relating to the acts or omissions, actual or alleged, committed by Grantholder and/or Host Institution. The Grantholder and/or Host Institutions agree that any activities by the India Alliance in connection with the Award, such as its review or proposal of suggested modifications to the Fellowship, will not modify or waive the India Alliance's rights under this paragraph. An Indemnified Party may, at its own expense, employ separate counsel to monitor and participate in the defence of any Claim.