

HIDDEN FIGURES

**Financial conflicts at the heart of the UK's
scientific advisory groups during the Covid crisis**



Undeclared financial relationships

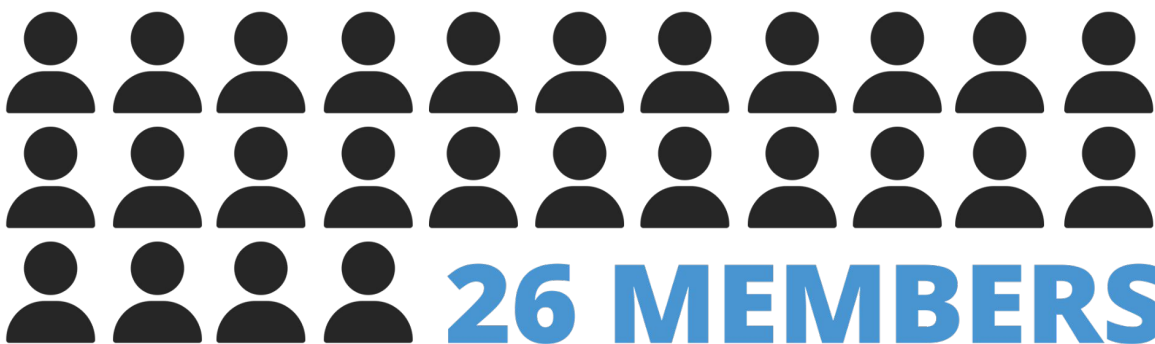
The Government's Scientific Advisory Group for Emergencies (SAGE)

provided highly-consequential scientific advice to UK government ministers, particularly in the early phases of the Covid crisis.

Members of SAGE were expressly required, for the duration of their participation in SAGE, to declare in an official **register of interests** any research funding relationships which the public might reasonably consider could give rise to a **potential conflict of interest**.

We have identified **£212 million** of research funding relationships involving **26 members of SAGE** that we believe should have been declared but were not declared.

£212M UNDECLARED FUNDING



Expectations of SAGE members

According to information obtained from the Government by the BMJ via a freedom of information request, summarised in a BMJ-authored article from December 2020,¹ when joining SAGE and on an ongoing basis all members of SAGE were asked to complete and sign a declaration titled 'SAGE Declaration of Interest',² which stated as follows:

"If any SAGE participant has a conflict of interest relevant to the remit of the group, s/he must declare it to the secretariat. In order to identify potential conflicts of interest, all SAGE participants should complete the form below. Participants must declare any potential conflict of interest at the time of their consent to be included on the SAGE contact list and must promptly notify the secretariat of any changes."

To help SAGE members to understand what kinds of interests should be declared, the form went on to explain:

"In completing the form, please consider the following, non-exhaustive list of potential interests:

- *Commercial interests (e.g. businesses owned, contracts awarded)*
- *Research interests*
- *Funding secured (past or present) and/or applied for*
- *Previous provision of expert opinion and/or testimony"*

“

If any SAGE participant has a conflict of interest relevant to the remit of the group, s/he must declare it... ”

Expectations of SAGE members



Members should ask themselves whether the public would reasonably consider that the interest in question might influence them. ”

A code of practice produced by the Government for all of its scientific advisory groups, the current version of which was updated in 2021 and which the Government has since confirmed as applying to SAGE, states:

“Chairs and members [of scientific advisory groups] must regularly provide the secretariat with a declaration of interests. Members should ask themselves whether the public would reasonably consider that the interest in question might influence them. [...]

Potential conflicts of interest which Chairs and members should declare include private financial or non-financial interests (or those of their close family members) which conflict or may be perceived to conflict with the [group]’s duties. Examples include ... research interests, ... [and] funding secured (past or present) and/or applied for...”

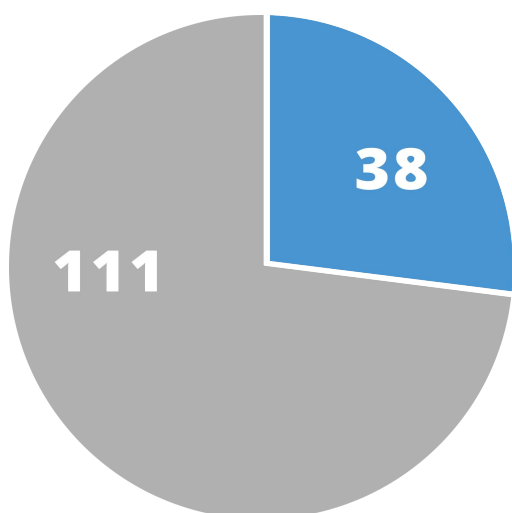
So the test that SAGE members were, and are, expected to apply is objective: **would the public reasonably consider that a personal or professional interest could give rise to an actual or potential conflict of interest that *might* influence the member.**

The requirement to provide a declaration of interests is not a statutory obligation, but it seems clear that the Government’s expectation is and was that all actual or potential conflicts of interest should be declared.

Many SAGE members were involved in research projects funded by the Wellcome Trust

By comparing the Government's official published list of 149 SAGE³ members for the period of the Covid crisis to research funding data published by the Wellcome Trust,⁴ it is apparent that **38 members** of the main SAGE committee (more than **one quarter of the members of SAGE**) were either applicants or the sponsoring academic for **research grants provided by Wellcome** for projects taking place between 2018 and 2026. In aggregate, the value of those grants totalled **£262 million**.

We are able to know this *only* because the Wellcome Trust has been transparent about its research funding relationships by publishing details of every grant that it has made on a publicly-accessible database that we have been able to download and analyse.



A quarter of the members of SAGE had a funding connection with Wellcome ”

Declarations of interests

Of those 38 SAGE members, 12 declared their research funding relationships with the Wellcome Trust, and those relationships were then published in the official SAGE Register of Participants' Interests (the SAGE ROPI).⁵

But 26 SAGE members did not declare their interests in Wellcome Trust research funding for publication in the SAGE ROPI. **That undeclared funding amounts to £212 million for research taking place between 2018 and 2026, of which £133 million was attributable to research projects that were ongoing during 2020 and 2021**, the key period during which SAGE members were advising the Government on its response to the Covid crisis.

26 MEMBERS
£212 million

The existence of those grants and the identities of the beneficiaries was and remains public domain information because the Wellcome Trust has published its database of funding relationships; some or all of these relationships may also have been referenced in research papers or other articles published by the relevant individuals.

It was not, however, and is still not, information that would be apparent to anyone looking at the SAGE ROPI. A central purpose of the SAGE ROPI must be to expose to public scrutiny any actual or potential conflicts of interest and risks of bias which are specifically relevant to the activities of SAGE and its members.

Declarations of interests

Although many of the Wellcome Trust grants that were not declared appear to have been funding non-Covid-related research, a minority **were** funding Covid-related projects, and others supported broader epidemic and pandemic-related research.

Regardless of the nature of those research projects, however, **the existence of a material financial relationship with Wellcome was within the scope of interests required to be disclosed** – and this seems to be affirmed by the fact that 12 members of SAGE declared their funding relationships with Wellcome even when those relationships were wholly unrelated to the Covid crisis.

One such example of a member who **did** declare an interest is Professor Russell Viner, who was part of a group of 11 academics at Oxford University who together had received funding from Wellcome to support research into adolescent mental health which had commenced in 2015 and was ongoing during 2020 and 2021. Professor Viner declared his research funding relationship with the Wellcome Trust for publication in the SAGE ROPI.

Some of the 26 SAGE members who did not declare a financial relationship with Wellcome did declare other research funding relationships (including for non-Covid research projects) with organisations such as the EU, the Medical Research Council, the UK National Institute for Health Research, and individual pharmaceutical companies.

The scale of the research funding relationships that were not declared

Of the 26 SAGE members who did not declare their financial relationships with Wellcome in the SAGE ROPI, **ten members account for over £120 million worth of funding**, for research projects that were ongoing during 2020 and 2021, the key period of SAGE's advisory activity.

Those 10 members include a number of **high-profile members of the main SAGE committee** whose views and comments were frequently quoted across UK media during the Covid crisis.

One of those individuals participated in Wellcome research grants totalling more than **£30 million**, while another was the sponsor or lead applicant for grants totalling more than **£25 million**.



Conflicts of interest and risks of bias

SAGE is meant to provide **independent** scientific advice to the Government in emergency situations. The Wellcome Trust is not, and plainly is not expected to be, an independent impartial organisation. On the contrary it is an organisation with a particular perspective on the management of epidemics and pandemics; and it is an organisation with some very substantial private financial interests.

We have detailed on page 12 how Wellcome's investment portfolio materially benefited from the performance of direct investments in companies whose success during the period 2020 to 2023 was enhanced by global lockdowns and/or the mass consumption of diagnostics, therapeutics and vaccines.

The Wellcome Trust has disputed that its portfolio of investments would ever compromise its objectivity, stating in 2021 that it *"would never make decisions or advise others about the pandemic response for a reason other than public health"*.

The fact that Wellcome has a partial perspective, and its own financial interests, is not inherently problematic. The Wellcome Trust has not in any sense concealed or obscured either its objectives, its financial interests or its research funding relationships. Indeed it is only because the Wellcome Trust has been transparent about its financial arrangements that we have been able to identify that certain members of SAGE have not declared relevant funding relationships in the SAGE ROPI.

But the interests of the Wellcome Trust cannot be assumed to be aligned in all respects with the interests of the public, so the existence of material financial relationships between SAGE members and Wellcome could undoubtedly give rise to risks of conflicts of interest or bias for the members concerned.

The Wellcome Trust

The Wellcome Trust is a **globally-influential charitable foundation** and the largest charity in the UK with endowment investments worth in excess of £35bn. One of its core objectives is to advance *“the discovery, development and optimisation of interventions to control and combat infectious diseases”*.⁶

At the outset of the Covid crisis, in April 2020, Wellcome launched the **‘Global Covid Zero initiative’** to raise and then deploy US\$8bn for investment in *“vaccines, treatments and testing for coronavirus”*.⁷

At the time, **Wellcome described pharmaceutical interventions as the world’s “only exit strategy”**, predicated on the basis that until all three of those products were available *“ongoing cycles of lockdowns and social distancing”* would be necessary.⁸

W
wellcome

What do we need to do to stop COVID-19?

Accelerated research, development and approval of vital vaccines and therapies.

- 

Wider roll-out of testing to screen for the disease
- 

Vaccines to stop the disease in its tracks
- 

Treatments to make this disease less debilitating and less deadly (reducing the need for respirators and ventilators, freeing hospital and medical resources)
- 

Production, stockpiling, and widespread global distribution of needed treatments, vaccines, tests and equipment

8

COVID
0

April 2020

The Wellcome Trust

Wellcome's Covid Zero initiative was structured so that funds raised by Wellcome would be distributed to four international organisations focused on vaccines, therapeutics and diagnostic products.

Wellcome's funding for Covid vaccine research was channeled through CEPI, the Coalition for Epidemic Preparedness Innovations. CEPI in turn funded the development of nine Covid vaccine candidates during 2020 and 2021, including Oxford-AstraZeneca (approx £290m), Novovax (£300m) and Moderna (£1m).⁹

Wellcome co-founded CEPI 2017 and it has become *"a global partnership working to accelerate the development of vaccines and other biologic counter-measures against epidemic and pandemic threats"*. Since it was formed, according to CEPI, Wellcome has provided more than a quarter of a billion dollars in funding to the organisation.

**WELLCOME'S CONTRIBUTION
TO CEPI: US\$281 MILLION**

Thus the Wellcome Trust appears to have had — legitimately, and for understandable reasons — a particular outlook on the way that epidemic and pandemic threats can and should be managed.

Wellcome and Proximal Origins

Wellcome's director during the Covid crisis period was Sir Jeremy Farrar. He was also a member of SAGE.

In March 2020, a group of five named experts published the now widely-known *Proximal Origins of SARS-CoV-2* paper which sought to discredit the lab-leak theory for the source of Covid. Much has been written on this topic since.



A US Congressional Sub-Committee staff report of July 2023 concluded that Jeremy Farrar, acting in his capacity as director of the Wellcome Trust, "*led the drafting process*" for that paper and played a key role in editing and signing off that paper. In evidence given to that committee, Farrar was referenced by the cited authors of the *Proximal Origins* paper as both a "*leader*" and a "*father figure*" for the production of that paper.¹⁰

When the *Proximal Origins* paper was published, however, Farrar's involvement was not disclosed. The paper did though include a note of thanks to the Wellcome Trust "*for its support*", and made reference to a Wellcome grant of £1.7m which had been awarded to a group of academics led by one of the five named authors of the paper.

Jeremy Farrar did not respond to our request for comment.

Wellcome's financial interests

Unrelated to its research funding and advisory activities, Wellcome's published annual reports show that its investment portfolio benefited during the period 2020 to 2023 from the performance of substantial direct investments in companies whose success during that period was significantly enhanced by global lockdowns and/or the mass consumption of diagnostics, therapeutics and vaccines, including:

- A **US\$1 billion** investment in food delivery group DoorDash (2021)
- Substantial investments of **more than US\$500 million** in each of Alibaba (2020) and Amazon (2022)
- Substantial investments, worth **hundreds of millions of dollars**, in Johnson & Johnson (2022), Roche (2022) and Novartis (2023)



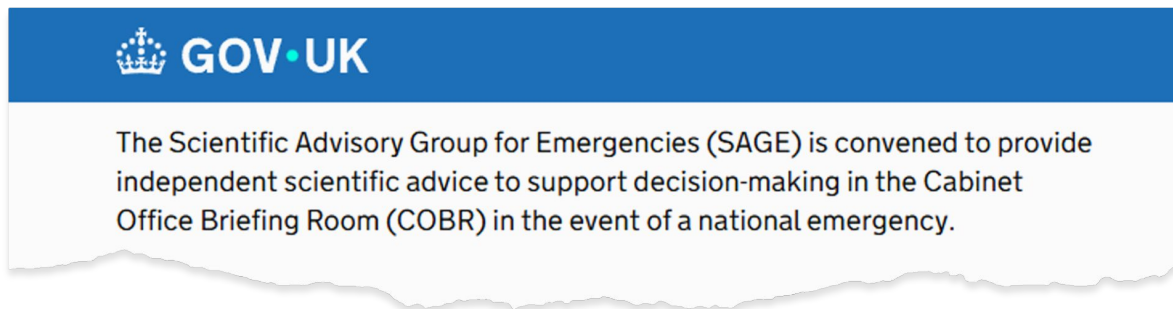
In 2022, *The Guardian* reported that the Wellcome Trust was poised to commit **£16 billion** to new funding relationships as a result of a **“phenomenal year” for its portfolio of investments**.¹¹

As noted above, the Wellcome Trust has disputed that its portfolio of investments would ever compromise its objectivity.

Transparency is key for trust

The failure of SAGE members to declare in the SAGE ROPI their interests in Wellcome Trust grant funding matters.

It matters because SAGE was meant to be providing **independent advice** to the Government on **highly-consequential** matters of public health policy.



It should not be controversial to suggest that those given the privileged position as members of expert advisory groups during a crisis should be **transparent** about any professional or personal relationships which might affect, or reasonably be perceived as affecting, the independence of their advice.

If the public is expected to trust the quality of the Government's independent scientific advice, **there needs to be absolute transparency** about any third party financial relationships and other material influences or dependencies which might affect those advisers.

What we cannot yet see

In addition to the main SAGE committee, during the Covid crisis many experts were involved in one or more of the **nine sub-groups of SAGE** (including SPI-B, the behavioral insights group, and SPI-M, the modelling group) and the related but separate advisory committee, NERVTAG. The advice of each of these sub-groups could be, and arguably was, as consequential for the pandemic response as the advice of the main SAGE committee.

The names of most of the members of each sub-group have been made public, but in some cases even the names of certain members of those sub-groups have been withheld from the public.

SECRET

While members of main SAGE were in many cases also members of one or more of the SAGE sub-groups, the sub-groups also included members who were not members of main SAGE.

We have made FOIA requests to the Government asking it to publish copies of the ROPIs for each of those SAGE sub-groups plus NERVTAG, none of which appear ever to have been made public.

For this reason, the figures presented above, which concern research funding relationships with a single private funding provider, must be assumed to be at best only a partial picture of the extent to which funding relationships which *should* have been declared by SAGE members were not in fact declared.

References

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