Dated: February 2026

NBC PAKISTAN CODE OF CONDUCT FOR MEMBERS, SECRETARIAT AND MEETINGS

National Bioethics Committee, Health Research Institute – NIH

This Code sets binding standards of behavior for everyone who serves NBC: members, sub-committee members (NBC-R, IRB Registration Committee, Appeals Sub-Committee, Technical Working Groups), co-opted experts and Secretariat staff at HRI–NIH.

1. Preamble, scope and guiding principles

Legal basis. NBC is the statutory body for the ethical governance of human health research in Pakistan under the Health Research Institute – NIH Act 2021, read with the NBC gazette notifications of 2004 and 2010. Public trust in NBC depends on its members and staff acting independently, competently and without self-interest.

Sources of good practice. This Code adapts the WHO Standards and Operational Guidance for Ethics Review of Health-Related Research (2011), the CIOMS International Ethical Guidelines (2016), the Declaration of Helsinki (2024 revision), ICH-GCP E6, the UNESCO Universal Declaration on Bioethics and Human Rights (2005), and the Seven Principles of Public Life (Nolan principles).

Who it applies to.

Group	Includes	Signs
Members	NBC, NBC-R, IRC, Appeals Sub-Committee, TWG members (honorary or official)	Annex 1 and Annex 2 on appointment, Annex 2 yearly
Co-opted experts and observers	Subject specialists, invited guests, external reviewers	Annex 1 before first access to papers
Secretariat	HRI–NIH officers, coordinators, IT and support staff	Annex 1 on joining

Guiding principles. Every person covered by this Code shall act with:

1. **Primacy of participants**: the rights, safety, dignity and wellbeing of research participants come before the interests of science, sponsors, institutions or NBC itself.
2. **Independence**: decisions free from pressure by government, sponsors, institutions, investigators or colleagues.
3. **Integrity and honesty**: no use of the position for personal, professional, financial or political gain.
4. **Impartiality and fairness**: equal treatment of every applicant, public or private, local or foreign, large or small.
5. **Confidentiality**: protection of proposals, personal data, deliberations and commercial information.
6. **Competence**: decisions grounded in evidence, the applicable guidelines and adequate preparation.
7. **Accountability and transparency**: reasoned, recorded decisions that can be explained and appealed.
8. **Respect and inclusion**: courtesy toward colleagues, applicants and the public, regardless of gender, faith, ethnicity, discipline or seniority.

Where this Code conflicts with a statute, government service rule or court order, the law prevails. Where it is silent, the guiding principles decide.

Part A: Code of Conduct for NBC Members

Members serve in a personal capacity, not as representatives of their employer, profession, province or nominating body. They owe their duty to research participants and to NBC.

A1. Independence and integrity

1. Exercise independent judgement; do not seek or accept instructions on any case from any person or body outside the committee.
2. Do not lobby, or allow yourself to be lobbied, on behalf of any applicant, investigator, sponsor or institution.
3. Do not use NBC membership, title or letterhead to promote personal, institutional or commercial interests, or to imply NBC endorsement.
4. Do not act as a paid consultant, advisor or ghost-writer to any applicant on a submission that NBC will review.
5. Report to the Chair any attempt to influence a decision improperly.

A2. Conflict of interest

A conflict exists when a financial, professional, institutional, family or personal interest could affect — or could reasonably appear to affect a member's judgement.

1. **Annual declaration.** Submit Annex 2 on appointment and every January, and update it within 15 days of any change.
2. **Case declaration.** Before each agenda item, declare any interest. Typical interests:
    - you, a spouse, close relative or business partner is an investigator, co-investigator, sponsor, employee or shareholder;
    - you hold a post (Head, Dean, IRB Chair or member) in the applicant institution;
    - you have received payment, grants, gifts or hospitality from the sponsor in the past 3 years;
    - you are a known competitor of the applicant or have a public dispute with them;
    - you have already reviewed or advised on the same proposal elsewhere.
3. **Recusal.** A conflicted member leaves the room (or virtual meeting) for discussion and decision, does not vote, and is not counted toward quorum for that item. The Secretary minutes the declaration and the exit.
4. **Doubt.** When unsure, declare; the Chair decides, and the reasoning is minuted. If the Chair is conflicted, the Vice-Chair or senior-most member presides for that item.
5. **Non-disclosure** of a material conflict is a serious breach (Part D) and may void the affected decision.

A3. Confidentiality and data protection

1. Sign the confidentiality undertaking (Annex 1) before receiving any papers.
2. Treat all proposals, investigator brochures, personal data, minutes, deliberations and individual voting positions as confidential, during and after membership.
3. Use the material only for NBC business; do not copy, forward, upload to public AI tools or personal cloud storage, or keep it after the review ends.
4. Do not disclose the outcome of a review before the official letter is issued.

5. Return or securely delete papers at the end of each review cycle and on leaving NBC, and confirm this to the Secretariat.
6. Report any loss or suspected leak to the Secretariat within 24 hours.

A4. Gifts, hospitality and benefits

1. Do not solicit or accept gifts, payments, travel, hospitality or favours from applicants, sponsors, CROs or institutions with business before NBC.
2. Token items of nominal value (a pen, a meal served at an official meeting) are acceptable; anything else is declined or declared to the Chair within 7 days.
3. Honoraria for speaking or teaching are declared in Annex 2.

A5. Competence and diligence

1. Complete research-ethics training (and GCP where relevant) within 6 months of appointment and refresh it every 3 years.
2. Read all assigned papers before the meeting; primary reviewers submit written comments by the deadline set by the Secretariat.
3. Know and apply the NBC guidelines, SOPs and relevant national laws.
4. Decline a primary-review assignment outside your competence and tell the Secretary promptly so a reviewer can be co-opted.

A6. Attendance and commitment

1. Attend meetings regularly; give the Secretariat at least 48 hours' notice of absence.
2. Absence from 3 consecutive meetings without reasonable cause may lead the Chair to recommend replacement to the appointing authority.
3. Members remain bound by this Code for the full term, including between meetings.

A7. Public communication and social media

1. Only the Secretariat Focal person or a person the NIH representative, authorizes, speaks for NBC to the media or the public.
2. Members may teach and publish on bioethics in their own name, but must not discuss specific applications, applicants or internal deliberations, or present personal views as NBC positions.
3. Do not comment on social media on any matter pending before NBC.

A8. Respectful behavior

1. Treat colleagues, staff, applicants and invited investigators with courtesy and respect.
2. Harassment, bullying, intimidation or discrimination of any kind is prohibited, consistent with the Protection against Harassment of Women at the Workplace Act 2010.
3. Challenge arguments, not people.

A9. After membership ends

1. Confidentiality obligations continue indefinitely.
2. For 12 months after leaving, do not represent an applicant before NBC on a matter you dealt with as a member.

Part B: Code of Conduct for the NBC Secretariat

The Secretariat is the custodian of NBC's records, timelines and public face. Staff remain bound by the NIH service regulations; this Part adds duties specific to ethics administration.

B1. Neutrality and integrity

1. Process every application on equal terms and in order of receipt, except where an expedited route is formally authorized.
2. Do not advise applicants on how to influence a decision, and do not give any indication of a likely outcome.
3. Do not accept gifts, payments, favors or hospitality from applicants, sponsors or institutions, beyond token items of nominal value.
4. Declare to the Focal Person any personal, family or financial link with an applicant; another officer handles that file.
5. Never alter, back-date or selectively omit documents, minutes, timelines or portal entries.

B2. Confidentiality, records and data security

1. Give access to files only to members and designated staff for NBC who need them for an assigned task.
2. Circulate papers through the official portal or official email only; do not use personal email, WhatsApp groups or public file-sharing for confidential papers.
3. Keep physical files locked; protect portal accounts with strong passwords and two-factor authentication where available; never share log-ins.
4. Retain records for the periods set in NBC SOPs (at least 3 years after study completion) and destroy them securely afterwards.
5. Report any breach, loss or unauthorized access to the Focal Person within 24 hours; the Focal Person informs the Chair.

B3. Service standards to applicants

1. Acknowledge every submission and assign a tracking number on receipt.
2. Communicate in writing, courteously and in plain language; state deficiencies completely in one notice rather than in repeated rounds.
3. Meet the timelines in the relevant SOP; tell the applicant in writing if a timeline will slip, and why.
4. Answer status queries within 5 working days.
5. Keep the public register of registered IRBs and approved projects accurate and current.

B4. Support to the committees

1. Circulate the agenda and complete papers at least 7 days before an ordinary meeting.
2. Collect conflict-of-interest declarations and maintain the register of interests.
3. Check and record quorum, attendance and recusals at every meeting.
4. Draft minutes accurately and neutrally, recording decisions, reasons, conditions and any vote — never inserting views not expressed.
5. Issue decision letters only after the minutes or decision sheet is signed by the competent authority.

B5. Professional behavior

1. Do not speak to the media or post about NBC business without written approval of the Chair or Focal Person.
2. Treat members, applicants and colleagues with respect; harassment and discrimination are prohibited.
3. Complete orientation on research ethics and on this Code within 3 months of joining.

Part C: Conduct During Meetings

These rules apply to all NBC, NBC-R and sub-committee meetings, whether in person, virtual or hybrid.

C1. Before the meeting

1. The Focal person issues notice, agenda and papers at least 7 days ahead (48 hours for an emergency or expedited meeting, with reasons recorded).
2. Members confirm attendance and declare foreseeable conflicts at least 48 hours ahead so the Secretary can check quorum.
3. Primary reviewers send written comments by the set deadline.
4. No unauthorized member other than NBC Members with Secretariat staff can attend any proceedings.
5. Virtual participants use a private location where others cannot see or hear the proceedings.

C2. Opening

1. The Chair opens on time once quorum is confirmed. If quorum is not reached within 30 minutes, the meeting is adjourned and no decisions are taken.
2. **Quorum** (unless the relevant TORs set a higher bar): more than half of members, including at least one scientific member, one non-scientific/lay member and one member not employed by HRI–NIH; both genders should be present.
3. The Chair reminds members of confidentiality and calls for declarations of interest on every agenda item; the Secretary records them.
4. The minutes of the previous meeting are confirmed and action points reviewed.

C3. Deliberation

1. The Chair manages time and ensures every member, especially lay and junior members, has the chance to speak.
2. One speaker at a time, through the Chair; no side conversations or interruptions.
3. Discussion is evidence-based and focused on participant protection, scientific validity, risk–benefit, consent, privacy, fair selection and community concerns.
4. Disagree with ideas, never with persons; personal remarks, raised voices and disrespect are out of order.
5. Phones on silent; no recording, screenshots or live messaging about proceedings, except the Secretariat's official recording where authorised.
6. Investigators or institution representatives may be invited to present and answer questions, but they leave before deliberation and decision.
7. Observers attend only with the Chair's approval, sign the confidentiality undertaking, and do not take part in deliberation or decisions.

C4. Decision-making

1. Decisions are sought by **consensus** after full discussion.

2. If consensus is not reached, the decision is by **simple majority** of eligible members present and voting; the Chair has a casting vote in a tie.
3. Conflicted members are excluded from discussion and vote and do not count toward quorum for that item.
4. Every decision is one of the categories set in the relevant SOP (for example approve, approve with conditions, defer/revise, reject) and is recorded **with reasons**.
5. A member who disagrees may ask that a dissent be noted in the minutes, without attribution in external letters.
6. Decisions by circulation (email or portal) are allowed only for routine or expedited matters set in SOPs, require written responses from a quorum, and are ratified at the next meeting.

C5. Closing and after the meeting

1. The Chair summarizes decisions and action points before closing.
2. Draft minutes are circulated within 10 working days; members comment within 5 working days; the Chair signs.
3. Decision letters are issued only after signature, within the timeline set in the SOP.
4. Members return or delete working papers as instructed and do not discuss individual decisions until letters are issued.

C6. Role of the Chair

The Chair is the guardian of this Part: maintains order, ensures fairness and recusal, may call a member to order, and may suspend a meeting that cannot continue in an orderly way. The Chair also speaks last on contested items to avoid steering the discussion.

Part D: Breaches, enforcement and review

Reporting. Anyone may report a suspected breach in writing to the Chair (or, if it concerns the Chair, to the Executive Director HRI). Reports made in good faith are protected from retaliation.

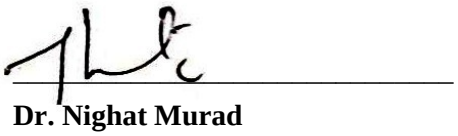
Process. The Chair appoints 2–3 members with no link to the matter to examine it. The person concerned is told the allegation in writing and given at least 10 working days to respond. Findings are reasoned and recorded.

Severity	Examples	Possible action
Minor	Late declaration updates, repeated late papers, minor discourtesy	Advice or written reminder from the Chair
Serious	Undisclosed conflict on a decided case, breach of confidentiality, repeated absence, acceptance of gifts	Formal warning; removal from the case; decision re-opened; suspension from meetings
Gross	Deliberate leak, soliciting benefits, falsifying records, harassment	Recommendation to the appointing authority for removal; for staff, action under service rules; referral to law-enforcement where an offence is suspected

A decision affected by a serious breach may be reviewed afresh by members not involved. The person concerned may appeal to the full NBC.

Review. The Secretariat reviews this Code every 3 years, or sooner after a change in law or NBC structure, and NBC approves amendments.

Approved and issued by:



Dr. Nighat Murad
Member Secretary, National Bioethics Committee (NBC)
Executive Director, Health Research Institute (HRI–NIH)
Islamabad
February 2026

Annex 1 — Confidentiality undertaking

I, _____ (name), serving as _____ (member / co-opted expert / observer / Secretariat staff) of the National Bioethics Committee, undertake that:

1. I have read and will comply with the NBC Code of Conduct.
2. I will keep confidential all information I receive through NBC, use it only for NBC business, and not disclose it to anyone not entitled to it, during and after my service.
3. I will not copy, retain or upload confidential papers to any personal or public system, and will return or securely delete them when instructed.
4. I will report any loss or unauthorised disclosure within 24 hours.

Signature: _____

Date: _____

CNIC: _____

Annex 2 — Declaration of interests

Name: _____

Role: _____

Period covered: _____

Type of interest	Details (organisation, nature, amount if financial)	Ongoing or ended (date)
Employment, posts and directorships		
Consultancies, advisory roles, honoraria (past 3 years)		
Research grants or sponsorship received (past 3 years)		
Shares or financial interests in pharma, device, CRO or health companies		
Membership of other IRBs/ERCs or regulatory bodies		
Interests of spouse or close family relevant to NBC work		
Any other interest a reasonable person might see as relevant		

I declare that the above is complete and correct, and I will update it within 15 days of any change.

Signature: _____

Date: _____

References

1. Health Research Institute – NIH Act 2021; NBC Gazette Notifications (2004, 2010).
2. NBC SOP for the Registration of Institutional Review Boards (NBC/SOP/IRB-REG/01, v2.1).
3. NBC Regulatory Framework for the Registration of Institutional Ethical Review Boards and Enforcement of Compliance.
4. World Health Organization. Standards and Operational Guidance for Ethics Review of Health-Related Research with Human Participants (2011).
5. CIOMS. International Ethical Guidelines for Health-related Research Involving Humans (2016).
6. World Medical Association. Declaration of Helsinki (2024).
7. ICH E6 Guideline for Good Clinical Practice.
8. UNESCO. Universal Declaration on Bioethics and Human Rights (2005).
9. Seven Principles of Public Life (Nolan Principles).