



Policy for Declaring Conflicts of Interest for British Association of Dermatologists' Service Standards Authors

1. Scope

- a) This Policy document is an adaptation of the NICE Code of Practice for Declaring and Dealing with Conflicts of Interest, issued April 2007 and reviewed November 2019. It is aimed specifically at all named authors of the British Association of Dermatologists' (BAD) Service guidelines as published on the BAD website and NICE evidence library, i.e. all members of a Working Party Group (WPG). It describes the circumstances in which they should declare an interest that might conflict, or be perceived to conflict, with their responsibilities as impartial authors of evidence-based Service guidelines written on behalf of the BAD.
- b) In this Policy document, the definition of terms set out below will apply (where relevant):
- 'Healthcare industry' encompasses:
- companies, partnerships or individuals who are involved with the development, manufacture, promotion, sale or supply of health technologies that are, or may be, used by the NHS including medicinal products subject to the licensing provisions of the Medicines Act (1968) and relevant EU legislation; and medical devices subject to relevant EU legislation
 - companies, partnerships and individuals who are involved in the development, manufacture, promotion, sale or supply of products or services which are advertised, promoted or marketed as contributing to the promotion or maintenance of good health
 - trade associations, both in the UK and elsewhere, representing companies involved with such interventions
- 'Professional Organisations' refers to:
- the medical, nursing, and midwifery Royal Colleges and Faculties
 - health and public health professional associations, bodies and societies
 - universities
 - NHS organisations
 - any other bodies with whom the BAD has a relationship or with whom the BAD is considering entering a relationship
- 'Advocacy Group' refers to:
- organisations whose functions include speaking for and on behalf of individuals and groups with an interest in health or health-related matters
- 'Family members' refers to:
- a spouse or partner living in the same residence as the member of the WPG, children for whom the member is legally responsible, and adults for whom the member is legally responsible (e.g. an adult whose full power of attorney is held by the individual)
- c) Members of the WPG are reminded of the conflicts of interest section of the guidance for doctors, Good Medical Practice, produced by the General Medical Council (GMC).
- d) This policy document is consistent with the BAD's policy for declaring conflicts of interest.

- e) Members of a WPG should declare any interests not specified in this Policy document which they believe could be regarded as either influencing their advice or role, or be perceived to influence their advice or role.

2. Who is covered?

All named authors of a WPG, which may include the following (but not limited to):

- BAD members
- nursing representatives
- other professionals or professional organisation representatives
- patient representatives
- BAD staff

3. What interests are involved?

- a) The following is intended as a guide to the types of interest that should be declared. If a person covered by this code (as defined in section 2) is uncertain whether an interest should be declared, he or she should seek guidance from the Chair of the BAD Service Standards WPG or the BAD Head of Clinical Services/ Project Manager.
- b) Neither an individual covered by this Policy document nor the BAD are obliged to search out links of which they could not reasonably be expected to be aware between a company or organisation in which they have a connection or interest and another company or organisation.
- c) Although particular attention is given to WPG members' financial interests, the BAD is also conscious that risks to an individual's reputation could also be (or be perceived to be) prejudicial to his or her advice. Arrangements covering 'reputational risk' are therefore also considered in this document (see below).
- d) A **personal financial interest** involves a current (see below) personal payment in excess of £100 which may either relate to i) the manufacturer or owner of a product or service being evaluated, in which case it is regarded as '**specific**', or ii) the industry or sector from which the product or service comes, in which case it is regarded as '**non-specific**'. The main examples include the following:
- Any consultancy, directorship, position in or commissioned fee-paid work for a healthcare industry that attracts regular or occasional payments in cash or in kind, which have been undertaken in the 3 years preceding the first WPG meeting, at which point the declaration is made.
 - Any fee-paid work commissioned by a healthcare industry for which the individual is paid in cash or in kind, both those which have been undertaken in the 3 years preceding the first WPG meeting, at which point the declaration is made.
 - Expenses and hospitality provided by a healthcare industry company for accommodation, meals and travel to attend meetings and conferences, which have occurred in the 3 years preceding the first WPG meeting, at which point the declaration is made.
- No personal interest exists in the case of:
- Assets over which WPG members have no financial control (e.g. wide portfolio unit trusts and occupational pension funds) and where the fund manager has full discretion as to its composition (e.g. the Universities Superannuation Scheme).
 - Accrued pension rights from earlier employment in the healthcare industry.
- e) A **non-personal financial interest** involves payment or other benefit in excess of £100 that benefits a department or organisation for which WPG members have board-level position of

managerial responsibility, but which is not received personally. This may either relate to i) the product or service being evaluated, in which case it is regarded as '*specific*', or ii) the manufacturer or owner of the product or service, but is unrelated to the matter under consideration, in which case it is regarded as '*non-specific*'. The main examples include the following:

- The holding of a fellowship endowed by the healthcare industry.
- Any payment or other support by the healthcare industry that does not convey any financial or material benefit to an individual personally but that might benefit him or her. Examples include:
 - i. a grant from a company for the running of a unit or department for which a WPG member is responsible
 - ii. a grant or fellowship or other payment to sponsor a post or member of staff in the unit for which a WPG member is responsible
 - iii. the commissioning of research or other work by, or advice from, staff who work in a unit for which the WPG member is responsible

N.B. WPG members covered by this Policy document are not obliged to seek out knowledge of work done for, or on behalf of, the healthcare industry within the departments for which they are responsible if they would not normally expect to be informed.

- f) A **personal non-financial interest** might include, but is not limited to:
- i. a clear opinion, reached as the conclusion of a research project, about the service and/or cost effectiveness of an intervention under review
 - ii. a public statement in which an individual covered by this Policy document has expressed a clear opinion about the matter under consideration, which could reasonably be interpreted as prejudicial to an objective interpretation of the evidence
 - iii. holding office in a professional organisation or advocacy group with a direct interest in the matter under consideration
 - iv. other reputational risks in relation to an intervention under review
- g) A **personal family interest** relates to the personal interests of a family member and involves a payment in excess of £100 to the family member of the WPG members. The interest may either relate to i) the manufacturer or owner of a product or service being evaluated, in which case it is regarded as '*specific*', or ii) to the industry or sector from which the product or service comes, in which case it is regarded as '*non-specific*'. The main examples include the following:
- Any consultancy, directorship, position in or work for a healthcare industry that attracts regular or occasional payments in cash or in kind.
 - Any fee-paid work commissioned by a healthcare industry for which the family member is paid in cash or in kind.
 - Any shareholdings, or other beneficial interests in a healthcare industry which are either held by the family member or an individual for which a WPG member covered by this Policy document has legal responsibility (e.g. children, or adults whose full Power of Attorney is held by the individual).
 - Expenses and hospitality provided by a healthcare industry company
 - Funds which include investments in the healthcare industry that are held in a portfolio over which individuals have the ability to instruct the fund manager as to the composition of the fund

No personal family interest exists in the case of:

- Assets over which individuals have no financial control (e.g. wide portfolio unit trusts and occupational pension funds) and where the fund manager has full discretion as to its composition (e.g. the Universities Superannuation Scheme).
- Accrued pension rights from earlier employment in the healthcare industry.

- h) WPG members should not accept expenses or hospitality from the healthcare industries, other than to seek reimbursement for the costs involved in travel, accommodation and associated subsistence, for attending conferences at which they have been asked to speak or otherwise play a formal role.

4. When should interests be declared and what action is required?

WPG members will need to fill in the COI Declaration for Service Guideline Authors form prior to the first meeting. Prior to the consultation of the service guidelines by BAD, WPG members will need to review the form and update as necessary should any potential conflicts of interest arise during the development of the guidelines.

5. Conditions and exclusions

The following are mandatory:

- a) Individuals with the following types of personal financial interests shall not take part in guidelines development:
- Any shareholdings, or other beneficial interests, in shares of a healthcare industry that are either held by the WPG member or an individual for which the WPG member has legal responsibility (e.g. children, or relatives whose full Power of Attorney is held by the individual).
 - Funds which include investments in the healthcare industry that are held in a portfolio over which WPG members have the ability to instruct the fund manager as to the composition of the fund.
- b) WPG members with relevant i) personal financial interests and ii) personal family interests during and 3 years prior to the development of the guideline shall not chair a WPG or be the first or last author of the published guidelines.
- c) In addition, a WPG shall ideally consist of a minimum of 51% of members with no personal or non-personal financial interests.

The BAD Service Standards Unit will provide assistance to WPG members with their declaration of interests.

6. Record of interests and their publication

A record is kept of:

- names of WPG members who have declared interests, providing dates and names of relevant interventions and companies
- the nature of all declared interests

The information is held at the BAD and is available for public inspection.

Conflict of Interest Declaration for Service Standards Authors

Please read carefully the above policy document before clicking on the link below to complete your declaration:

<https://www.surveymonkey.co.uk/r/M8QFJ2S>