

Code of practice on declarations of interest

1. Introduction

Purpose of the Code

This Code of Practice sets out the rules to be followed by directors of the IPCRG Board and its sub-committees who have conflicts of interest that may create problems, for example they

- Inhibit free discussion
- Result in decisions or actions that are not in the best interest of the IPCRG
- Risk giving the impression that the IPCRG has acted improperly.

The purpose of this code is to protect the IPCRG and the individual involved by offering guidance on declaration of those interests. This is common and expected practice in clinical and academic organisations because their activities and recommendations may affect health policy, resource allocation and practice.

As a charity whose value to clinicians and the public depends on independence from any particular source of influence, it is important to have in place a robust policy governing the declaration and management of conflicts of interest. For transparency and accountability, this Code of Practice is published on our website. Individuals will be offered a form when they make their declaration. A confidential register of interests will be maintained by the Business Manager on behalf of the Company Secretary (the IPCRG Treasurer). It will be accessible only to the Chief Executive Officer and Chair of Committee except if legislation mandates disclosure.

2. Declaration of interests

- Annually, or as appropriate, in relation to the IPCRG Secretariat will ask all directors and members of sub-committees (described in this document as “members” from here on) to declare their interests and any gifts or hospitality over the value of fifty GB pounds received in connection with their role in the IPCRG. The value of the declaration will be expressed within four bands:
 - Band A: Less than € 1001
 - Band B: € 1001 - € 5000
 - Band C: € 5001 - € 20000
 - Band D: more than € 20000
- A declaration of interest form is provided for this purpose listing the types of interest to be declared.
- In addition, the chair of a meeting will ask at the beginning of a meeting for any updates. Members may prefer to email these updates to the Secretariat in advance of the meeting and in this case the chair of the meeting will note this at the beginning of the meeting. These declarations will be written in the minutes.
- Interests are personal or non-personal, and specific or non-specific
 - A **personal** interest involves the payment or any other benefit affecting a member’s financial interests to that member by an organisation whose business may be directly affected by the advice of the IPCRG. It may also include a close relationship with, or a strong antipathy to, a person or organisation whose interests may be affected by IPCRG activity
 - A **non-personal** interest involves payment or any other benefit that could affect a family member of an IPCRG individual (as described in paragraph 2a. above) or people with whom the individual has a close association, e.g. a department for

which a member is responsible, but is not received by the member personally.

- A **specific** interest is where payment or interaction relates to a particular product under discussion eg a new drug
 - A **non-specific** interest is not related to the particular product under discussion eg someone may sit on an Advisory Board for a company wanting advice on how to develop primary care or respiratory products in general, which is different from advising on the strategy for promotion of a particular branded product such as an inhaler.
- e. The interests declared are quantified only within the four bands described - specific amounts are not required. For example, in declaring a grant received by a department for which the IPCRG individual is responsible, the company name is required, and the band value of the grant.
- f. To preserve anonymity, it is not necessary to list the name of beneficiaries when declaring a non-personal interest.
- g. If you are not sure what to declare, please err on the side of full disclosure. If you would like to discuss, please contact the Chief Executive Officer, President or Treasurer for confidential guidance.

3. Data Protection

The information will be used for management purposes only and the IPCRG will operate within relevant legislation. A confidential register of interests will be maintained by the Business Manager on behalf of the Company Secretary (the IPCRG Treasurer). It will be accessible only to the Chief Executive Officer and Chair of Committee, except if legislation mandates disclosure.

4. What to do if you face a conflict of interest

If you already believe you have a conflict you should declare that you have a conflict of interest, and the nature of that interest, before the matter is discussed or as soon as it becomes apparent to you. The chair of a committee or meeting should advise, reinforce and remind members of the need to declare any conflicts of interest, real or potential, at the beginning of a meeting or as the need arises. The chair of the meeting will judge whether and to what extent a conflict exists, and will determine what part the member may take in deliberations of the meeting. Not taking part may involve not speaking or leaving the room or teleconference. The declaration will be recorded in the minutes, eg "a member declared a personal, non-specific interest."

Relationships with two industries are particularly likely to come under scrutiny: the tobacco industry and the pharmaceutical/respiratory device industry. There is a fundamental difference between them: we would normally not allow any relationship with the tobacco industry, while we would normally allow a relationship with the pharmaceutical/device industry, as long as that relationship were transparent.

However, this latest draft of the policy reflects a fast-moving field where e-cigarettes may be licensed for use as medicinal products, and where e-cigarettes may be manufactured by e-cigarette companies, pharmaceutical companies or tobacco companies. Tobacco industry ownership or significant stakeholding in a pharmaceutical company is a new circumstance that would require discussion with the board at the earliest opportunity.

Tobacco industry

The tobacco industry includes tobacco product and e-cigarette manufacturers, wholesalers, distributors or importers.

With regard to relationships with the tobacco industry, members cannot accept hospitality or gifts, represent, consult for, work for or conduct research for the tobacco industry and cannot directly own shares in any tobacco product manufacturer, wholesaler, distributor or importer (except share holdings through general mutual funds or similar arrangements where you do not have control over the selection of shares), and must not have done so for at least two years.

Members must not disclose the contents of any IPCRG material, work or product which is not publicly available to the tobacco industry.

Pharmaceutical industry

Other than in exceptional cases, we would not expect a relationship to be problematic as long as it is declared and the following action taken:

- A non-personal, non-specific interest with the pharmaceutical industry would not debar a member from attending, speaking or voting at a meeting,
- A non-personal, specific interest would permit a member to attend, speak and vote at the discretion of the chair of the meeting,
- A personal, non-specific interest would permit a member's attendance but not speaking or voting,
- A personal, specific interest would require the member to leave the room or teleconference for the duration of the item under question and not have a vote.

If the IPCRG Secretariat becomes aware that a director has benefited from the decision, notwithstanding they did not participate in the decision, this will be reported in the annual report and accounts in accordance with best practice.

5. Managing Contracts

IPCRG members with responsibility for the management of IPCRG funds or funds provided by other agencies through contracts with IPCRG for specified activities must be cognisant of their responsibility to behave in an honest and ethical manner at all times to maintain the good name of the IPCRG. The Board has procedures to ensure appropriate accountability and reporting. In the event that these procedures are not followed to the satisfaction of the Board or regulatory agencies, a contract may be terminated.

Siân Williams
3 March 2015

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