

## **POLICY ON DECLARATION OF INTERESTS**

### **PURPOSE**

1. This policy is intended to help the persons covered within its scope to identify; those matters, personal to them, which could conceivably conflict with the interests and efficient running of the Association and / or with its standing within the medical community. **It shall form part of the Rules of the Society.**

### **SCOPE**

2. The persons covered by this policy, who are required to make declarations on behalf of themselves only, are: -
  - i. all **Trustees**,
  - ii. all **Governing Board Members**
  - iii. all **Employees**
  - iv. all **members of the Standing Committees**, which includes the **members of other Committees** and working groups set up by the **Governing Board**, at the discretion of the **Governing Board**.
3. Such declarations shall be seen to be **a condition of Membership** of the Society and **a condition of employment** for employees of the Society.

### **DECLARATIONS REQUIRED**

4. The persons covered by this policy are required to declare, in the manner and form prescribed, any matter of personal interest;
  - of a commercial and / or professional nature, which
  - impinges, or is felt likely to impinge, on any aspect on the running of the Association, and
  - which may be seen or be expected to allow them to benefit financially and / or in some other way.
5. What is likely to constitute a conflict of interest will be left to each individual in the first instance. However, areas of conflict could include involvement with any external organisation seeking to do business with the Association and membership of a parallel organisation whose objects could conflict with those of the Association.
6. Specific interests which, will be expected to be declared, include:
  - **Connections with pharmaceutical, diagnostic or other healthcare supply companies**, as regards:
    - **consultancies** with these companies
    - **sponsorship / hospitality** from these companies in excess of £750 in the preceding 12 months
    - **research grants** from these companies
    - **share holdings** greater than £10,000 in these companies
  - **Trusteeship and/or Committee Membership of other charities and professional organisations.**

7. When in doubt a Member should consult the Secretary to seek advice as to whether a particular personal interest is likely to constitute a conflict. The Secretary shall be at liberty to discuss the matter with Governing Board before providing such advice.
8. Excluded from such declarations are contracts of employment with the Association and related benefits and any legitimate reimbursement of expenses approved by the Association's Rules.

#### **MANNER AND FORM OF DECLARATION**

##### **9. Declarations may be made verbally or in writing:**

###### **Written Declarations:**

- 9.1 These will include annual declarations, which should be made on forms adopted by the Governing Board and should indicate **positively**, whether or not the person making the declaration has anything to declare.
- 9.2 Written declarations **must** also be made during the year when any matter arises which may produce a conflict **and also** in confirmation of verbal declarations (see below) where the matter is of sufficient importance and / or the conflict is likely to continue.
- 9.3 The forms should be presented to the **Secretary** who will decide whether any action needs to be taken in any individual case. Declarations requiring action should be drawn to the attention of the Governing Board. The forms will be held by the **Secretary**, and will constitute a **Declarations Register**. The Register should be available at meetings of the Governing Board and of the trustees.
- 9.4 Personal declarations by the Secretary will be considered by the President and dealt with as above.

###### **Verbal Declarations:**

- 9.5 These should be made as and when a conflict of interest arises at any meeting of the Society and where necessary, as indicated above, should be followed up by a written declaration.
- 9.6 All meetings of the Governing Board and of the trustees should have a regular agenda item at the beginning of the meeting requiring anyone present to make a declaration. All declarations should be minuted.

#### **CONSEQUENCES OF DECLARATION**

10. The immediate consequence of a declaration is that the person making it should seek to mitigate its effects. This may be achieved by the person distancing himself or herself from the matter of conflict and by taking no part in making or influencing any decisions, which would be seen to exacerbate the conflict.
11. Where the conflict persists the Governing Board shall decide on what course of action to take.

#### **CONSEQUENCES OF FAILURE TO DECLARE**

12. When it is discovered that a person covered by this policy has failed to make a declaration of interest, this fact should be drawn to the attention of the Governing Board. The Governing Board must then decide on the appropriate action, taking into account the nature of the matter not declared and any apparent benefit seen to be enjoyed by the person not having made the declaration.
13. If the matter is sufficiently serious the Governing Board may convene a general meeting to consider the continuing membership of the person concerned.

#### **IMPLEMENTATION OF THE POLICY**

14. The Secretary shall provide copies of the policy to Governing Board members and trustees, to all new Members and to any other Member requesting a copy.
15. The policy shall be implemented with effect from the date it is adopted by the members in general meeting.

*Adopted by the Trustees, 19 April 2004*

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