

PCDS Conflicts of Interest Policy

1. Background – Why have a policy?

To maintain and enhance the reputation of the PCDS as an independent, charitable professional organisation, it is critical that all its activities are, and are perceived to be, free from commercial or personal interests particularly in relation to diabetes policy and education/guidance.

Moreover, Trustees have a legal obligation to act in the best interests of the Charity and in accordance with the memorandum and articles of association and to avoid situations, as far as possible, where there may be a potential conflict of interest.

Conflicts of interest may arise where an individual's personal (or family) interests and/or loyalties conflict with those of the PCDS. Such conflicts may create problems such as:

- Inhibit free discussion
- Result in decisions or actions taken that are not in the best interests of the PCDS
- Risk causing the impression that the PCDS has acted improperly

As far as the PCDS is concerned, the links and interests of most concern relate to the pharmaceutical industry and other organisations in the diabetes field. The aim of this policy is to protect both the PCDS and individuals involved, from any impropriety or appearance of impropriety. The policy is reviewed and updated on an annual basis by the PCDS committee.

2. Declaration of Interests Register

2.1 Process

All Trustees/members of committees, working parties/other groups which have delegated authority/powers ('committees') will be asked to declare their interests for the previous calendar year at the point they join a 'committee' and on an annual basis in January thereafter. A declaration of interest form is provided for this purpose, identifying the types of interests that should be declared.

If the form is not completed/updated within 6 weeks of being issued (inclusive of two reminders), the member may be asked to stand down temporarily until a form is received.

Any new interests not contained on the register accrued during the year are notified to the PCDS Operations Team and/or declared at the next Committee meeting regardless of relevance to a given agenda item. A list of new interests accruing by individuals during the year is logged by the PCDS Operations team and circulated as part of the agenda for any Trustee/Committee meeting.

2.2 Nature of interests to be declared

- **Financial interests:**

Where an individual may get direct financial benefit¹ from the consequences of a decision they are involved in making. For example:

- i. If you are a director, non-executive director, senior employee, major shareholder (more than 5% of issue), partner or owner of a private, public limited or non-profit company, business or consultancy, which is seeking to do, or doing business with the healthcare organisation under consideration
- ii. If you are a consultant, under secondary employment with, under contract or in receipt of a grant or research funding from any individual or company acting for the healthcare organisation under consideration

¹ This may be a financial gain, or avoidance of a loss.

- iii. Have an association with pharmaceutical and other medical companies for which you have attended an Advisory Board as a consultant in the past 3 years
- iv. Have an association with pharmaceutical and other medical companies for which you have delivered sponsored education in the past 3 years
- v. Roles that you hold a professional contract with (i.e., for which you earn a salary/fee)
 - NHS roles
 - Academic roles
 - Private sector or government consultancies
- vi. If you have a pension that is funded by the healthcare organisation under consideration (where the value of this might be affected by the success or failure of the said organisation).

- **Non-financial professional interests:**

Where an individual may obtain a non-financial professional benefit from the consequences of a decision, they are involved in making, such as increasing their professional reputation or promoting their professional career. For example:

- i. Professional non-financial roles
 - Membership of DUK, Royal Colleges etc.
 - Any decision-making roles e.g., if you sit on a board/committee for other groups, TREND, IDEAL etc.
- ii. You act as an advocate for a particular group of patients; are a GP with special interests e.g., in diabetes or heart failure; are a member of a particular specialist professional body (although not routine GP membership of the RCGP, BMA or a medical defence organisation); are an advisor for CQC or NICE or are an active medical researcher.
- iii. Other potential conflicts of interest not covered by the above categories

- **Non-financial personal interests:**

Where an individual may benefit personally in ways which are not directly linked to their professional career and do not give rise to a direct financial benefit, because of decisions they are involved in making in their professional career. For example:

- i. If you are a voluntary sector champion for an interested party; a volunteer for an interested party; a member of a voluntary sector board or have any other position of authority in or connection with an interested party in the voluntary sector; a member of a political party; suffer from a particular condition requiring individually funded treatment within the remit of the area of interest; or act as a financial advisor.

- **Indirect interests:**

Where an individual has a close association² with another individual who has a financial interest, a non-financial professional interest or a non-financial personal interest and could stand to benefit from a decision they are involved in making. For example:

- i. A spouse or partner, a close relative (parent, child or sibling), a close friend or business partner.

2.3 Publication and review of the register

The interests declared by each PCDS Trustee/Committee member will be available on request.

The complete declaration of interest (DOI) register (listing the interests, by individuals plus other 'non personal interest', significant other role) for all PCDS Trustees/Committee members will be maintained by the PCDS supporting administration team. The register of interests for PCDS is reviewed annually by the PCDS Trustees such that they can identify and manage potential conflicts of interest overall for the organisation and by committee.

The list of new interests accrued by individuals during the course of the current year will be circulated with the agenda for each committee meeting.

² A common-sense approach should be applied to the term 'close association'. Such an association might arise, depending on the circumstances, through relationships with close family members and relatives, close friends and associates, and business partners.

2.4 Handling enquiries

If an enquiry is received from any source about a potential Conflict of Interest, the enquirer will be asked to make the request in writing to the supporting organisation (OmniaMed) who will follow it up with the Chair of the Committee and the individual member concerned. A response will be given within a reasonable period.

3. Handling Potential Conflicts of Interest

3.1 General principles

The PCDS needs the expertise and contribution from a wide range of primary care health professionals, who are likely to have varying levels of interest in the pharmaceutical industry and other organisations in the diabetes field. The following general principles shall apply in managing the potential conflicts that may arise:

- PCDS as a matter of policy adheres to best practise and evidence-based guidelines, both national and international, wherever practical, particularly when making recommendations on individual products or product classes. In some circumstances, such as its work influencing policy through government organisations and guideline groups the PCDS may make recommendations on the use of specific products / classes of products: these circumstances require specific attention when managing conflicts of interest.

3.2 Meetings

Declaration of interests shall be the first agenda item at any 'committee' meeting. Individuals will be asked to declare any interest they have relevant to any particular agenda item. If individuals are not sure whether an interest should be declared they should err on the side of caution.

If individuals fail to declare an interest that is known to the Chair of the Committee (or any other member of the committee), the Chair or member should declare the interest.

Any committee member with a conflict of interest regarding a specific agenda item requiring decision making, will be excluded from the vote.

All decisions in which a potential conflict of interest is identified will be recorded by the organisation and reported in the minutes of the meeting.

3.3 Decisions outside meetings

For matters arising outside formal 'committee' meetings, the Committee/Subcommittee Chair, project lead or anyone else with delegated authority to make decisions, must ensure that relevant potential conflicts of interest are taken into consideration and handled according to the same principles set down for meetings.

3.4 Managing educational grants or sponsorships

Where possible, any Trustee/Committee member with a potential conflict of interest must not be involved in managing or monitoring an educational grant or sponsorship in which he/she has a personal interest. Monitoring arrangements for such educational grants or sponsorships will include provision for an independent challenge of invoices and termination of the educational grant or sponsorship if the relationship is unsatisfactory.

Reviewed by PCDS Trustees: September 2023

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