

Declaring and registering conflicts of interest: policy and procedures

Contents

1. Purpose and scope	3
2. Background	3
3. The 'Declaration of Interests' form	4
4. Trustees	5
5. Declaring and managing interests at Council, board and committee meetings	6
6. Speakers at College events and in online videos	7
7. Examiners, examinations and examination preparation courses	8
8. College publications	9
Appendix 1. Declaration of interest form for use by members of RCR Council, boards and committees and contributors to RCR publications	13
Appendix 2. Declaration of competing interests form for speakers and presenters	14
Appendix 3. Examples of conflicts of interest relating to NICE-accredited College publications	16

1. Purpose and scope

This document sets out the policy of the College for managing conflicts of interest (or perceived conflicts of interest) in respect of any individual who is undertaking work on behalf of the College in the capacity of a Fellow or member of the College or other person engaged to do work apart from College employees and staff contractors where separate arrangements apply. Its purpose is to ensure transparency and the open and proper management of any conflict of interest to protect both the College and the individual from any appearance of impropriety. It aligns with and complements the provisions of the College's Code of Conduct for Council members, and should be read in conjunction with that document.

This document covers how conflicts of interest are managed for College trustees; board and committee meetings; speakers; examiners; and authors of, or contributors to, the *Newsletter*, journals and College publications.

2. Background

Conflicts of interest are a condition and not a behaviour. There is nothing wrong in there being a conflict of interest, but it is important that these are identified and declared so that they can be managed appropriately. The College is independent of governments, industry, etc and it must be seen to be so in everything that it does. As a charity registered with the Charity Commission, the College must adhere to guidelines set out by the Commission about its overall purposes, and must be able to demonstrate that its purposes are for the public benefit.

The Charity Commission sets out the legal obligations of a charity trustee, and the College's Conflict of Interest policy is based on the Commission's advice (www.gov.uk/manage-a-conflict-of-interest-in-your-charity). In the Commission's document *Conflicts of interest: a guide for charity trustees* (www.gov.uk/government/uploads/system/uploads/attachment_data/file/636091/CC29.pdf) it is stated that a conflict of interest is any situation in which a trustee's personal interests or loyalties could, or could be seen to, prevent them from making a decision only in the best interests of the charity. This policy covers wider issues than the position of trustees who for the College are the eight Officers and the ten elected members of Council, Council being the 'trustee board' of the College.

Conflicts of interest may arise where an individual's personal or family interests conflict or appear to conflict with those of the role that the individual is undertaking for the College. Such conflicts may create problems – either inhibiting free discussion and resulting in decisions, actions or published advice that are not in the best interests of the College – or risking the impression that the College has acted with inappropriate influence or bias.

It is recognised that conflicts can also arise between an individual's duty to the College and some other public obligation, trusteeship of another organisation or membership of/ employment by another organisation. Therefore the individual may have divided loyalties, but does not stand to gain financially or in any other way. Where this arises, the person should declare it and is expected to act in the best interests of the College in his or her work for the College.

Individuals working on behalf of the College have a duty to declare any conflict of interest. Such a declaration is not a statement of 'wrongdoing', and a conflict of interest does not necessarily invalidate the work, but ensures openness and transparency, so that the validity of the work can be judged by others.

A potential conflict is anything which could be perceived as impairing impartiality or objectivity and hence casts doubt over a decision that has been taken. If in doubt, an individual is advised to declare a potential conflict of interest so that it can be reviewed and the College can determine the appropriate action to take. The General Medical Council's (GMC) *Good Medical Practice* (2013) points out: 'Probity means being honest and trustworthy, and acting with integrity: this is at the heart of medical professionalism. You must make sure that your conduct at all times justifies your patients' trust in you and the public's trust in the profession'. The College expects that all Fellows and members will follow this advice.

3. The 'Declaration of Interests' form

The following are examples of items that, where relevant to the work being undertaken, should be declared on the appropriate 'Declaration of Interests' form (Appendix 1), although this list is not exhaustive. The list is the same that Council members and senior staff are required to complete in declaring their interests.

- Offices held in a professional body, specialist society, medical Royal College or similar body in the public, private or voluntary sector. Offices include posts such as President, Chair, Chief Executive, Treasurer and Secretary, and also membership of a committee.
- Consultancies, directorships or advisory positions if they relate to a medical, healthcare or pharmaceutical company or organisation, public body or political party, or any company that seeks work in the healthcare sector.
- Financial interests in, or other potential sources of income from medical, healthcare or pharmaceutical companies or organisations, including the receipt of a payment from an organisation with an interest in the field or shareholdings in a company that operates in the healthcare, pharmaceutical or related sectors.
- Non-personal financial support from industry i.e. payment which benefits a department for which a member is responsible, but is not received by the member personally (for example, a grant towards the running of a unit, a fellowship or other payment to sponsor a post, the commissioning of research or consultancy work etc).
- Offices held on boards or in senior positions of employment, consultancies, advisory positions with existing or potential suppliers to, or recipients of funds from, the RCR.
- Any other public appointments.
- Any other interests which should be declared (this should include any medals and prizes awarded, membership of a relevant disease pressure group).

In the case where there is nothing notifiable to declare, a form should still be submitted, stating this fact.

4. Trustees

The Officers and elected members of the RCR Council are the trustees of the College as a registered charity and are expected to act impartially and objectively, and to take steps to avoid any conflict of interest arising as a result of their membership of, or association with, other organisations or individuals. In this regard, Council takes the role of the 'trustee board' in charity terms. The guidance from the Charity Commission for trustees can be found in *Conflicts of interest: a guide for charity trustees* (www.gov.uk/government/uploads/system/uploads/attachment_data/file/636091/CC29.pdf)

Council has established a register of interests. Declaration of interests in the register for Council members is compulsory (see Appendix 1) and is published on the website at the start of each College year. Trustees are expected to update their entries in the register as necessary during their term of office on Council; such updates will be published.

It is impossible to draw up an exhaustive list of organisations, still less of individuals, association with which might, under certain circumstances, be considered to bring about a possible conflict of interest.

In general, Council believes that members of Council should declare membership of, association with, or financial interest in any organisation if, in the view of the Council member, a conflict of interest or the appearance of such a conflict could arise.

It is considered that the following interests need **NOT** be declared:

- Posts held in the ordinary course of employment or practice
- Ordinary membership of professional bodies, medical royal colleges or defence organisations
- Fellowship of professional bodies, medical royal colleges or specialist bodies
- Membership of local community organisations.

It is considered that the following interests **SHOULD** be declared:

- Any office held in a professional body, specialist society, medical royal colleges or any body in the public, private or voluntary sector
- Consultancies, directorships or advisory positions if they relate to a medical, healthcare or pharmaceutical company or organisation, public body or political party, or any company that seeks work in the healthcare sector
- Financial interests in or other potential sources of income from medical, healthcare or pharmaceutical companies or organisations, although investments in funds or other investment vehicles managed by an independent third party (for examples, unit trusts, investment trusts, pension funds, ISAs etc) need not be declared
- Business interests where relevant to the activities of the College
- Any other public appointments which are not held in the ordinary course of employment or practice.

In case of doubt, members of Council or staff may seek the advice of the Governance Officer regarding memberships, associations or interests they should declare.

The Governance Officer will be responsible for keeping the Register of Interests. Members of Council should amend their entries in the register as soon as possible following any change in their circumstances, and will, in any event, be invited to update their entries each year (following the AGM).

5. Declaring and managing interests at Council, board and committee meetings

On the agendas for Council, board and committee agendas the following wording should appear:

‘Please read the agenda and papers in advance of the meeting to determine if you have a conflict of interest (or there might be a perception of such a conflict of interest) in any of the subject matters. If this is the case or if you are in doubt, please advise the member of staff who supports the meeting as soon as possible so that it can be discussed with the chair of the meeting in advance and any action necessary to manage the conflict can be agreed.’

Where the risk of a conflict is low, the chair will check with members at the beginning of the meeting for any conflicts of interest and ensure the outcome is recorded in the minutes.

Where there is a high or an inevitable risk of conflicts (such as where the College has to rely on the expertise of those who may also be involved in commercial developments in the same area of activity as the work of the board or committee), advance declarations of interest will be sought so as to ensure they are given proper consideration before the meeting and the members concerned advised of the steps to be taken.

In these circumstances, board or committee members will be invited to make advance declarations on an online form that they have read the agenda and papers and either have no conflicts of interest or to list the conflicts that they have. The completed forms are returned to the secretary to the committee who will discuss the way forward with the Chair. The Chair may seek further advice as necessary.

The mechanism for managing declared conflicts is for the chair and the way the board or committee business is conducted to distinguish between decision making and decision taking.

1. Decision making – this relates to gathering all the information, views, options etc. needed to reach a decision. This should involve all the expertise needed including those who might have a conflict of interest in taking the decision. This group makes a recommendation. It may be necessary to exclude those with a conflict during the decision-making process as the discussions progress – that is, when things move from general principles to specifics/specifications that could give a commercial advantage. This would be before the decision is taken.
 2. Decision taking – the conflicted members will be excluded from the group that considers the recommendation and takes the decision.
 3. If there is a predominance of the conflicted, arrangements would be made to bring in other expertise, refer the recommendation to another appropriate body for the decision to be made, or to ensure the non-conflicted members are sufficient under quorum rules to take the decision.
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Guidance will be issued to committee chairs on handling conflicts of interest but there are three possible routes:

- a. Full exclusion of the conflicted member – rare and desirable to avoid
- b. Partial exclusion – exclude when the decision is taken – as in the two stage process described above
- c. Full involvement because the risk of inappropriate bias or influence of the decision or being perceived to compromise the fairness of a decision was deemed very low.

Within this, chairs and board and committee members need to consider the perception of conflict as often this is more prevalent than actual conflict.

A member of staff will be identified to advise on conflict matters: such a person could take an overview, ensuring consistency of approach.

6. Speakers at College events and in online videos

All those who speak at College events or who are recorded for online presentations are asked to declare any competing interests they might have. This applies to all types of events and presentations including workshops, lectures, seminars, webinars and recorded videos.

Once a speaker's booking has been confirmed, they will be asked whether they have a conflict of interest to declare. If they have a declaration to make they will be asked to complete a form (see Appendix 2) and return it to the RCR office. They will be required to make a brief oral statement and present a slide to this effect at the start of their talk. The form of oral statement is indicated by the questions in the declaration and the speaker will be provided with a template slide to complete.

Declaring an interest does not signify that the individual has been influenced by it. It is intended to achieve transparency and allow others involved in the event or observing the presentation to judge for themselves the potential for the speaker having been influenced.

A separate declaration should be completed for each presentation delivered live or recorded.

The table below lists the types of interest needing to be declared (see Appendix 3 for further details on each type).

Type of interest

Direct financial interests

Direct, non-financial interests (personal and professional)

Indirect interests

Information about conflicts will be passed to the meeting organiser so they will know that the speaker will make a statement at the start of their presentation.

7. Examiners, examinations and examination preparation courses

The RCR accepts that most examiners will be actively involved in teaching trainees and that this is one factor in making them well qualified to be examiners. However, care must be taken to ensure that the College can be seen to preserve the integrity of its examinations and not give unfair advantage to any particular group of candidates. It is important to define the boundaries between what teaching is desirable and acceptable for an examiner to undertake and what is not acceptable.

Examiners must avoid placing themselves under obligation to any individual or organisation which might affect their ability to carry out their duties as an examiner impartially and objectively. They must not use their position as examiners to promote or personally gain financially from activities.

The application forms for examiner vacancies require applicants to confirm that they are aware of this conflict of interest policy.

Definition

For the purposes of this document, an FRCR examiner is defined as someone, currently in post as an examiner, who:

- Is involved in question selection for the examinations
- Conducts the structured oral or clinical examinations
- selects images for examinations
- Marks papers
- Is a member of an RCR examination board, standard setting group or committee. [The boards and committees section of this document applies in respect of such work].

Teaching candidates

Examiners may take part in teaching activities related to FRCR examinations but must never use any materials for teaching which have been, or will be, submitted for consideration for exam use. This includes all questions and images whether or not they are used in the examinations.

Examiners may be involved in local training and oral examination practice as they will rarely assess their own trainees in the examination. As above, materials and cases used in teaching or local exam preparation must not be submitted for use in the examination.

Examiners must avoid giving rise to any perception that candidates they teach will benefit inappropriately from their specific knowledge gained as an examiner in ways that would not be available to other candidates.

Examiners may be asked to participate on pre-FRCR preparation courses. This is acceptable under the following conditions.

- Examiners must avoid face-to-face contact with course attendees in an oral examination practice environment. Examiners may advise candidates and/or course faculty on the running and conduct of the examination, but must not get involved with any discussions around specific content or the behaviour or preferences of individual examiners.
 - Examiners must not accept payment, other than reasonable travel expenses.
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- Examiners must not be involved in the ownership, management, curriculum design or advertising of commercial courses and must not accept shares of profits.

Contributions to publications

It is not acceptable for examiners, while in post, to write or contribute to non-RCR books or other materials such as online resources or to re-edit or revise existing texts or other publications whose specific purpose is to help candidates prepare for any or all parts of the FRCR Examination.

In addition, examiners are not permitted to make use of any material submitted for consideration for exam use. This includes questions and images. Questions developed for examinations are the intellectual property of the RCR.

Image and question contributors

Anyone who contributes images or questions for examinations without taking other examining roles is not bound by the above constraints but must never use any such materials for teaching which have, or will be, submitted for consideration for exam use.

Leaving office

The above restrictions on using materials which have been submitted for examination use will continue to apply after examiners have completed their term of office.

College examination preparation or similar courses

Where the College runs courses designed to help trainees prepare for FRCR examinations, any (potential) conflicts or perception of conflicts of course leaders and teachers are made known and managed appropriately in advance of or at the start of the course.

8. College publications

Authors of College documents have a duty to declare any conflict of interest when contributing to such College work. This includes writing, reviewing or updating a document. Such a declaration is not a statement of 'wrongdoing' and a conflict of interest does not necessarily invalidate a document, but ensures openness and transparency, so that the validity of the publication can be judged by others. Conflicts of interest and how they are managed should be referenced in the terms of reference.

The usual arrangement is for a document to be written or reviewed by a working group which may 'meet' informally and often by 'remote' means such as telephone conference, video conference, shared editing software or by exchange of emails. Regardless of the method of working adopted, all individuals who have direct input into a document will be invited to declare their relevant interests at the initial meeting of the working group and state into which of the categories (see Appendix 3) they believe the interest falls – this should be noted in the minutes of the meeting. When a conflict of interest is declared, the Chair, with the agreement of members of the committee must decide what action to take in line with the procedure adopted for boards and committees (page 6). If during the course of the work, there are any changes to an individual's declaration of interests, these should be recorded in the minutes of the meeting as well as what action was taken. Records of any conflict of interests for working party members should be retained for the lifetime of that edition of the guidance.

It is not expected that any one working party member's conflict of interest would impact on the final published document as any bias should be detected and managed during the consultation and approval process. Declarations of interest should be published in the final document.

Documents that have NICE Evidence Accreditation

The requirements described below are for publications for which National Institute for Health and Care Excellence (NICE) Evidence accreditation is being renewed (NICE is no longer accepting new applications for accreditation) and are in accordance with the NICE Evidence accreditation process manual.¹

All individuals being considered for a contribution to the document should declare any potential conflicts of interest on appointment, and at least annually thereafter if their role is a continuing one. Disclosure should reflect all current and planned commercial, non-commercial, intellectual, institutional and patient/public activities pertinent to the potential scope of the guidelines. Wherever possible, members should not have any conflict of interest and those members with conflict of interest should only represent a minority of the working party. In accordance with the NICE accreditation process manual, the Chair or Co-Chair cannot have any direct interests (financial, non-financial professional or personal) that relate to the services, interventions, products, or delivery of care to be considered within the scope of the guidelines. It may also be inappropriate for chairs to have relevant indirect interests, including when a close family member could potentially gain financially from the person's work with the RCR.

All declarations of conflict should be discussed before the work commences. Members of the group should explain how their conflict of interest (if existing) could influence the guideline development process or specific recommendations.

For documents that have obtained NICE Evidence accreditation,¹ declarations of interests will be published in the final document. An explicit conflict-of-interest statement from all individuals involved in the guidance and advice development declaring whether they have any direct (financial or non-financial professional and personal) or indirect interests should be included (see Appendix 3 for further details).

The chair and members of the working party should make their first declaration when applying for a specific role. The initial declaration covers the preceding 12-month period. Consideration should also be given to any new interests that are not currently held but will arise during involvement with the committee.

Individual members and co-optees should not be appointed if they have specific interests that mean they are likely to be excluded from more than 50% of the discussions.

For any documents that have NICE Evidence accreditation,¹ the following actions will apply.

The table below details the action required for each type of interest relating to NICE-accredited College publications and is based on NICE's Conflict of Interest policy which is discussed in more detail in Appendix 3.²

Type of interest	Action
Direct financial interests	<p>Any member or standing committee chair with a specific financial interest leaves the meeting for the duration of the relevant item.</p> <p>In exceptional circumstances, when a member has particular expertise that would otherwise not be available to the committee, they may attend to answer specific questions, but would not usually take part in the decision-making.</p> <p>When the interest relates to private practice and income in the commercial sector, a member may be able to participate if their clinical experience is considered vital to the discussion. In such circumstances, the level of involvement (full involvement or partial exclusion) will depend on the scope for potential benefit (and risk of conflict of interest).</p>
Direct, non-financial interests (personal and professional)	<p>Any member or standing committee chair with a specific non-financial interest may need to leave the meeting for the relevant item.</p> <p>Particular care is needed around any reputational interest related to positions held in other organisations, and publications authored or public statements made, which could reasonably be interpreted as potentially prejudicial to an objective interpretation of the evidence. A decision on participation should balance this risk with the benefit of the committee's access to the person's expertise.</p> <p>Involvement in guidelines developed in accordance with international criteria does not usually lead to exclusion from the meeting.</p>

Type of interest	Action
Indirect interests	Any member or chair with specific indirect interests usually needs to do no more than declare this interest. However, exclusion may be needed when a close family member could potentially gain from the committee's work.

College Newsletter

All authors who have content accepted to the *Newsletter* (including Letters to the Editors) are required to complete and return a signed Declaration of Interest form (Appendix 1) should their article be chosen for inclusion.

Where articles or other content have been commissioned by the *Newsletter* Editor, it is the responsibility of the Publications and Website Officer to secure from the contributing author a signed Declaration of Interest form and to keep a record of the declared interests.

Any declarations of interests will be published in the final document.

Journals

All authors submitting articles to either *Clinical Oncology* or *Clinical Radiology* are required to disclose, under a sub-heading 'Declaration of interest' during the online submission process, any personal relationships with other people or organisations that could inappropriately influence (bias) their work. This is held by the appropriate journal editorial office.

Examples of potential conflicts of interest include employment, consultancies, stock ownership, honoraria, paid expert testimony, patent applications/registrations and grants or other funding. Authors must disclose any indirect or direct financial interest they have in the subject matter of a submitted manuscript, or any other potential conflict of interest. If there are no conflicts of interest then please state this: 'Conflicts of interest: none'. For more information, see www.elsevier.com/conflictsofinterest.

All sources of funding should be declared as an acknowledgement at the end of the text. Authors should declare the role of study sponsors, if any, in the study design, in the collection, analysis and interpretation of data; in the writing of the manuscript; and in the decision to submit the manuscript for publication. If the study sponsors had no such involvement, the authors should so state.

References

1. National Institute for Health and Care Excellence. *Accreditation process manual – Process manual for accrediting producers of guidance, advice and recommendations for practice: a guide for producers and stakeholders*. London: NICE, 2017. www.nice.org.uk/Media/Default/About/accreditation/nice-accreditation-process-manual.pdf (last accessed 30/7/18)
2. National Institute for Health and Care Excellence. *Policy on declaring and managing interests for NICE advisory committees*. London: NICE, 2018

Appendix 1. Declaration of interest form

1. Offices held in a professional body, specialist society, medical Royal College or similar body in the public, private or voluntary sector:
If NONE please tick box , or list interests below, using attached sheets if necessary)

 2. Consultancies, directorships or advisory positions if they relate to a medical, healthcare or pharmaceutical company or organisation, public body or political party, or any company that seeks work in the healthcare sector:
If NONE please tick box , or list interests below, using attached sheets if necessary)

 3. Financial interests in, or other potential sources of income from medical, healthcare or pharmaceutical companies or organisations:
If NONE please tick box , or list interests below, using attached sheets if necessary)

 4. Non-personal financial support from industry i.e. payment which benefits a department for which a Member is responsible, but is not received by the Member personally (e.g. a grant towards the running of a unit, a Fellowship or other payment to sponsor a post, the commissioning of research or consultancy work etc):
If NONE please tick box , or list interests below, using attached sheets if necessary)

 5. Offices held on Boards or in senior positions of employment, consultancies, advisory positions with existing or potential suppliers to, or recipients of funds from, the RCR.
If NONE please tick box , or list interests below, using attached sheets if necessary)

 6. Any other public appointments
If NONE please tick box , or list interests below, using attached sheets if necessary)

 7. Any other interests which should be declared (this should include any medals and prizes awarded)
If NONE please tick box , or list interests below, using attached sheets if necessary)
-

I declare the interests listed above of myself and relevant persons connected to me, and confirm that these interests will not influence my actions in my work/appointment with/for the RCR.

I confirm that I have read and understood the Code of Conduct, including the Guidance on the Register of Interests.

I confirm that, to the best of my knowledge and belief, this is a full and accurate declaration of the interests that I am required to register. I undertake to inform the Chief Executive of the College promptly of any changes to my registrable interests.

I agree to abide by the Code.

Signed:

Name: Date:

Appendix 2. Declaration of competing interests form for speakers and presenters

In accordance with the RCR's Declaring and registering conflicts of interest policy, all those who speak at Royal College of Radiologists meetings or who are recorded for online videos/presentations are asked to declare on this form any competing interests (otherwise known as conflicts of interest) they might have relating to their presentations. This applies to speakers at all types of events and presentations including workshops, lectures, seminars, webinars and recorded videos.

Speakers who submit a form declaring a competing interest will be required to make a brief oral statement and present a slide to this effect at the start of their talk. The form of oral statements is indicated by the questions in the declaration and the speaker will be provided with a template slide to complete.

Note that declaring a competing interest does not signify that the individual has been influenced by the declared interest. It is intended to make interests more transparent and to allow others participating or observing to judge for themselves the potential for the individual having been influenced.

A separate declaration should be completed for each presentation.

Meeting or event title:

Meeting date:

Speaker's name:

Title of presentation:

1. Have you within the last three years accepted any income or gifts from an organisation which might be perceived in any way to gain or lose from the content of your presentation?
Please tick all that apply:
 Funds for a member of staff Fees for consultancy
 Funds for research A fee for speaking at a symposium
 Sponsorship for attending a meeting
2. Have you in the last three years been employed or involved with an organisation which might in any way gain or lose from the content of your presentation (for example: equipment manufacturers, pharmaceutical companies and independent healthcare organisations)?
 No Yes
3. Do you hold stocks or shares in an organisation which might in any way gain or lose from the content of your presentation?
 No Yes

4. Do you have any other competing financial interests?

No Yes (please specify below)

5. Does your personal partner or any other close family member have competing interests which should be declared?

No Yes

Signature:

Date:

Returning this declaration to: conf@rcr.ac.uk will be taken as confirmation that the information you have supplied is complete and correct.

Appendix 3. Examples of conflicts of interest relating to NICE-accredited College publications

Defining and categorising interests

Members of the guidelines working party bring a range of experiences and perspectives to RCR's work. It is likely they will have a variety of interests, arising from different contexts and activities done in a professional or personal capacity. This can include employment and other sources of income, speaking engagements, shareholdings, publications and research, and membership of professional or voluntary organisations.

Having members with varied interests is a positive attribute, but it is vital that interests are openly declared so they can be appropriately managed. Declaring an interest does not mean there is a conflict of interest.

All interests should be declared if, in the view of a reasonable person, they are relevant, or could be perceived to be relevant, to the work of the RCR committee in question.

For the avoidance of doubt, a person living with a disease or condition relevant to the matter under discussion, or who has a family member in that position, is not seen as an interest and this does not need to be declared.

It is important to exercise judgement, and if there is any doubt as to whether an interest is relevant to the committee's work, it should be declared. This includes indirect interests, such as those relating to family and friends, when they are known.

Direct interests

A direct interest is when there is, or could be perceived to be, an opportunity for a person involved with RCR's work to benefit. This benefit could be financial (a financial interest) or non-financial (a non-financial personal or professional interest). These are explained further below.

Financial interests

When a person gets direct financial benefit. This means anything of monetary value, including: payments for services; equity interests, including stocks, stock options or other ownership interests; and intellectual property rights, including patents and copyrights and royalties arising from such interests. Examples of financial interests are:

- Work in the commercial sector, including a directorship, employment, or consultancy, that attracts regular or occasional payments or benefits in kind such as hospitality. This includes clinicians undertaking private practice.
 - Ownership or part ownership of a healthcare provider, including a GP who is a partner in a practice or a community pharmacist who owns their business.
 - Direct payment from the commercial sector to attend a meeting, conference or event, over and above funding to support reasonable travel, accommodation and attendance costs.
-

- Shareholdings in the commercial sector.
- Funds that include investments in the commercial sector that are held in a portfolio where the person has the ability to instruct the fund manager as to the composition of the fund.
- Personal payment to undertake sponsored research.

Non-financial professional and personal interests

When a person has a non-financial professional or personal benefit, such as increasing or maintaining their professional reputation. This can include situations where the person:

- Is an advocate for a particular group or is a member of a lobbying or pressure group with an interest in health or social care
- Holds office or a position of authority in a professional organisation such as a royal college, a university, charity, or advocacy group
- Is actively involved in an ongoing or scheduled trial or research project aimed at determining the effectiveness of a matter under review
- Has published a clear opinion about the matter under consideration
- Has authored or co-authored a document submitted as an evidence publication to the relevant committee.

Indirect interests

An indirect interest is when there is, or could be perceived to be, an opportunity for a third party closely associated with the person in question to benefit. This could be through a close association with another person or organisation that has a financial or non-financial interest (as defined above), and could benefit from a decision the person is involved in making through their work on an advisory committee.

Indirect interests can arise from people (such as close relatives, close friends and associates and business partners), and also employers (for example with research grants or other funding to the unit in which they work).

Responses to declared interests


There are three potential responses following a declaration of interest:

- No action other than the process of open declaration – the person can engage in all aspects of the committee's work. This is usually because nothing is considered to represent a perceived conflict of interest, but may in some circumstances be because an open declaration is considered sufficient to mitigate any risk of conflict. Open declaration will usually be sufficient if a financial interest occurred in the last 12 months and is no longer held. For example, if a person has ceased to hold shares or undertake relevant private practice. This is because the potential to benefit has ceased.
- Partial exclusion – the person can engage in committee discussion or provide advice to the meeting (for example, because of their expert knowledge), but is excluded from developing recommendations and decision-making on the matter relating to the interest. Involvement may be limited to answering direct questions from the committee.
- Complete exclusion – the person can have no input to a specific topic, either from the start (non-appointment) or for part of the committee's work relating to that topic. When an interest leads to exclusion for a specific topic, it may be appropriate to withhold any

confidential meeting papers for that item especially when the person could benefit from the information.



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other person contributing to the formulation of the material.