BMJ Group policy on declaration of interests

The BMJ Group is committed to ensuring the independence and integrity of our content, products and services. To this end we strive to be transparent about any interests that our users, customers and partners might want to know about. This policy on declaration of interests applies to everyone involved in the conception, creation, and delivery of our content, products, and services.

1. What is a conflict of interest?

A conflict of interest arises when a person has a personal or organisational interest that may influence or appear to influence the exercise of his or her main activity. Usually this is a financial interest, but it may also be non-financial.

Our overriding aim is that there should be transparency about any personal or organisational interests that might be perceived as a conflict of interest in relation to the task a person is being asked to undertake for BMJ Group.

Conflicts of interest are often unavoidable, and must be managed as far as possible rather than prohibited. But some interests may be so conflicting that the individuals involved should not do the task the BMJ Group needs doing.

The examples given below in this document are not an exhaustive list. Individuals should ask themselves if there is anything that may strongly bias their judgement that might preclude them from performing the task requested of them or that a reasonable user of BMJ Group products and services might want to know, or that might cause embarrassment or reputational damage if discovered after the event.

We ask people to be as clear as possible about the activities, relationships and views they are declaring. We may ask for more details about any declaration. We would want to know, for example, what honoraria were for and how much they were for. In declaring travel expenses, we would want to know the task that was carried out during that travel.

To make things manageable we are interested in interests in the 36 months before the declaration and those known to be going to occur within the subsequent 12 months.

Personal financial interests

A personal financial interest exists when payments are made directly to an individual, whether as a salary or as fees or honoraria; or where an individual receives benefits from a third party who is not their main employer, such as a fellowship, equipment, writing or administrative assistance, or travel and accommodation expenses; or where an individual owns certain stocks and shares, patents, or other assets.

No personal financial interest exists in the case of assets over which individuals have no control, for example, unit trusts, occupational pension funds, and accrued pension rights.

Examples include:

- Employment
- Paid consultancy or directorship
- Ownership of stocks and shares
- Patent ownership or applications
- Paid membership of speakers panels/bureaus and advisory board
- Acting as an expert witness.
- Being in receipt of a fellowship, equipment, writing or administrative support
- Travel and accommodation expenses
- Writing or consulting for an educational company
Organisational financial interests

An organisational financial interest exists where the interest belongs at arm’s length to the individual—for example, where payments are made to the individual's organisation rather than to their own bank account.

Examples include: Research grants
Funds for staff or department

Non-financial interests

Non-financial interests can take many different forms, including personal or professional relations with organisations and individuals, and strongly held beliefs. Those that we want people to declare are unpaid positions which might have a bearing on the product or service being delivered by BMJ Group.

In addition, we encourage people to declare other personal interests that they consider may be a conflict of interest in the context of the task they are being asked to perform for the BMJ Group.

Examples include
- Unpaid officership of advocacy, charity, non-governmental organisation or relevant professional group.
- Unpaid membership of a guidelines panel.
- Unpaid advisory positions in commercial organisations.
- Personal relationships with authors or editors of material, including having held grants, co-authored articles or papers or worked together.

Interests of related parties

Conflicts of interest may also arise where a related party (spouse, partner, or other close family member) has a financial or non-financial interest as described above that could be seen to conflict with the task a person is being asked to undertake for BMJ Group.

Examples include: A spouse holding stocks or shares or being on the board of an organisation that might be affected by the task the person is doing for the BMJ Group.

2. When will you be asked to make declarations of interest?

We expect people to make declarations of interest before taking up any work for the BMJ Group or entering into a contract with us for your services.

Where the BMJ Group is recruiting new staff, a declaration of interests will be requested as part of the job application.

If we invite you to join an advisory board, or commission an article, lecture, or peer review report from you, we will ask you to declare your interests at the first approach in case there are conflicts of interest that preclude you from accepting the invitation.

Research articles submitted for consideration must be accompanied by a completed declaration.

3. Dealing with declarations of interest

In most cases disclosure will be sufficient, but in some cases an interest may be too conflicting. These are most likely to be current financial relationships or contractual arrangements that appear to prevent an individual from providing an unbiased expert judgement, e.g. where a person has signed a contract in which he or she agrees to be paid for advocating the opinion of that organisation or company. Any such conflicts would be discussed with the person who has disclosed them.
Decisions about whether or not an interest disqualifies the person from taking on a particular task for the BMJ Group will be taken by the relevant senior staff member. There would be a right to appeal to the head of the relevant department.

If a full declaration was not made at the time and a conflict of interest comes to light after the event, the BMJ Group reserves the right to retract any content affected by this conflict. The BMJ Group may also seek to terminate contracts or employment affected in this way, and may choose not to work with the individual in the future.

4. Who should declare?

All of the following people are asked to declare their interests before working for or undertaking a task for the BMJ Group
- Members of staff
- Members of the BMJ Group board
- Editors in chief of BMJ journals and products
- Members of Group advisory boards
- Consultants, contractors, and freelancers producing material for Group products and services, authors, series editors, peer reviewers.

We also encourage our partners and the co-owning societies we work with to use our declaration of interest policy and forms.

5. What happens to declarations?

Whenever possible, we will publish conflict of interest statements alongside the material to which it relates: at product level on the relevant website for senior staff, board members, and advisors and otherwise at the level of the article, module, or event.

Speakers at BMJ Masterclasses or conferences will be asked to show a slide summarising their declaration at the beginning of their talk.

We will review staff, board member, and advisor conflicts of interest annually.

Where material is peer reviewed, declarations will be sent to the peer reviewers.

The BMJ Group has regular brand integrity meetings where it will regularly review declarations of interest policies and audits of decisions.

Declarations of interest are kept on file in accordance with our Information Governance policies.

FG, LD, RM. 10 October 2012
BMJ Group Declaration of interests form

I declare that that I have read and understood the BMJ Group policy on declarations of interest. I hereby declare the following interests, according to the policy.

✓ I have the following interests to declare:

I have no personal financial interests to declare.

I am chief executive of National Voices which is an independent charity and umbrella organisation for 160 charities in the health and social care arenas. We work for a strong patient and citizen voice and services built around people. We stand up for voluntary organisations and their vital work for people’s health and care.

National Voices receives funding from a variety of sources including member subscriptions, grants from governmental bodies, grants from charitable foundations, fees for advisory and training services and corporate donations. Full financial details are in our latest annual report and accounts can be viewed here.

National Voices’ member organisations receive funding from a wide variety of sources. Our constitution requires that a majority of the National Voices board of trustees are nominated and elected by member organisations. The current trustee board can be viewed here.

National Voices is governed to ensure that we reflect the interests of our members and that we champion evidence-based, person centred approaches to health and care. We work on matters which are cross-cutting, not specific to particular conditions and diseases. We do not advocate for specific medicines, treatments, devices or other medical technologies.

Our relationships with funders are governed by an ethical funding policy designed to protect our probity and independence. Our relationships with pharmaceutical companies are also informed by the principles reflected in our recent guide produced jointly with the industry body ABPI.

As chief executive of National Voices I also sit on the BMJ patient panel.

☐ I have no relevant interests to declare

Name: Jeremy Taylor Signature Date 3 December 2015

Manager sign off:

Comments:

Review date

Name: Signature Date: