

# Conflicts of Interest Policy – Medical and Research Committee

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## Introduction

- This policy sets out the principles for avoiding, minimising and managing conflicts of interest for individuals involved in decision making for the Psoriasis Association.
- The Psoriasis Association has established a register for disclosable interests, covering general, academic and scientific interests.
- The Psoriasis Association has endeavoured to identify the main potential conflicts of interest, but it is difficult to foresee every eventuality. The Psoriasis Association expects all individuals to comply with the spirit of the policy as well as its content. If in any doubt, there should be consultation with the Chair and/or Chief Executive of the Psoriasis Association.

## Purpose of the Policy

1. To protect the Psoriasis Association against conflicts of interest that may be detrimental to activities by:
  - Ensuring that, in principle, individuals covered by the policy make decisions free from any external influences, either personal or institutional, whilst recognising that it is precisely their position and expertise external to the Psoriasis Association that enables individuals to make valuable contributions to its work.
  - Adhering to the rule that those who work on behalf of a charity should not be enabled to make a personal profit as a result of that work, for example by using information confidential to the Psoriasis Association for personal gain.
2. To protect the Psoriasis Association against conflicts of interest that may arise because of the positions, both internal and external, held by individuals who contribute to the Psoriasis Association's work in their area of specialisation.
3. To protect the Psoriasis Association and those individuals covered by the policy against impropriety or the appearance of impropriety, including reputation risk.

## Declarations

- Everyone covered by the policy must declare all his or her disclosable interests, including all consultancies or appointments. Declaration must be made on taking up an appointment with the Psoriasis Association or at such time as a disclosable interest arises. Declarations

should be updated annually. Declaration will be made using a disclosure form. If a potential conflict of interest is recognised during a meeting, there should be immediate disclosure.

- The responsibility always remains with the individual to take steps to deal with any conflicts of interest, or potential conflict of interest, as set out within this policy.
- Disclosed information will be treated in strict confidence and only made available to appropriate peer groups as necessary to prevent or minimise possible conflicts of interest and to facilitate consistency in the level of disclosures made.
- Potential conflicts of interest highlighted by declarations of interest, including consultancies and appointments, may normally be resolved by the individual concerned not participating in the relevant decision and being restricted in access to the information.

### **What constitutes a consultancy or external appointment?**

The following would constitute a consultancy or external appointment that must be disclosed:

- Trusteeship of any charity connected to medicine, science or any other matter in which the Psoriasis Association has an involvement.
- Positions with funding bodies, local government, government department and agencies, and intergovernmental agencies.
- Positions with funded institutions e.g. universities, colleges, libraries, research centres, including a university or college lectureship.
- Directorship - paid or unpaid - of a company involved in pharmaceuticals, biotechnology, biosciences, healthcare or similar activities.
- Provision of services through a consulting company or otherwise on a regular basis.
- Trusteeship of an NHS Trust.
- Political appointments.
- Provision of services to a company giving rise to fees exceeding £10,000 in a calendar year, or equity more than £10,000.

### **What does not constitute a consultancy or external appointment?**

The following would not constitute a consultancy or external appointment that must be disclosed:

- Provision of professional services, on a non-recurring basis, not giving rise to fees exceeding £10,000 from a single source in a calendar year.
- Receipt of fees or honoraria for a lecture providing it does not give rise to fees exceeding £10,000 from a single source in a calendar year.
- Trusteeship of a small or local charity with assets of less than £10,000.



## **What is a direct and obvious conflict of interest?**

A direct and obvious conflict of interest includes:

- A Committee member who is an applicant or co-applicant on a grant application.
- A Committee member who could be seen as a direct competitor of a grant applicant.
- A Committee member who works for the same institutional department as the grant applicant.
- Any appointment to organisations funding research in fields that may also be funded by the Psoriasis Association.
- Any appointment (except for Advisory Board appointments) to a pharmaceutical, biotechnology, bioscience, healthcare or similar company involved in an area relevant to the Psoriasis Association's interests.

## **Confidentiality**

- Research Committee members should not, prior to a meeting, discuss any application which is to be considered with any other committee member.
- Individuals must absent themselves from the relevant part of any meeting where matters concerning a grant with which they are connected are discussed. They may not take any part in any decisions taken in relation to such a grant proposal and should not receive any papers relating to it.
- Committee members who are approached by individuals or organisations for advice on a specific funding proposal or on the preparation, status or outcome of their specific applications should refer all such enquiries to staff of the Psoriasis Association.
- Every individual connected with the Psoriasis Association must keep confidential all information that is confidential to the Psoriasis Association.