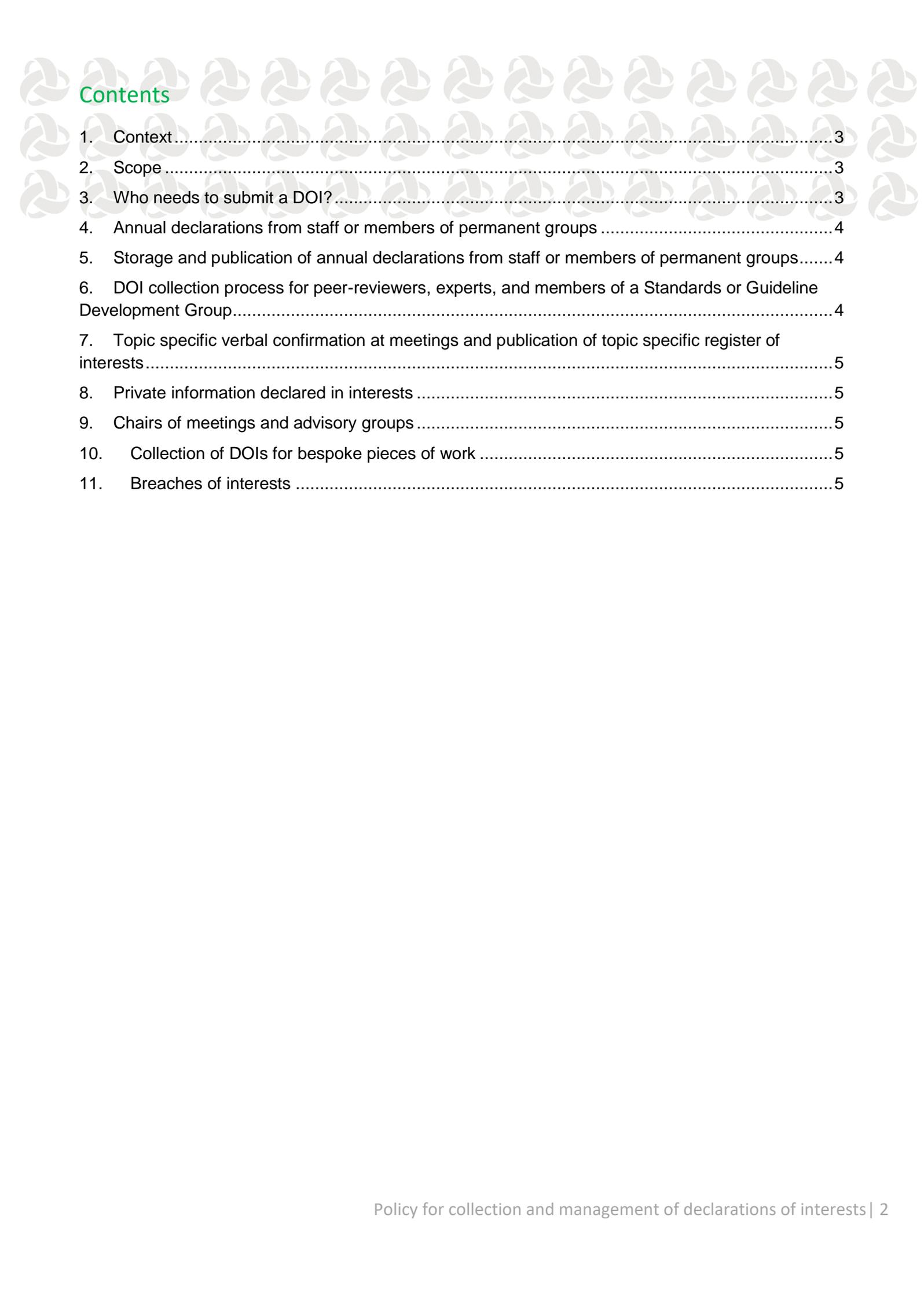




Healthcare
Improvement
Scotland

Evidence
Advice, guidance
and intelligence

Policy for collection and management of declarations of interests



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1. Context

Healthcare Improvement Scotland is committed to open declaration of competing interests in all its activities. In order to provide reassurance that outputs from the Evidence Directorate are impartial, it is important that all interests are declared and that potential conflicts are handled consistently and appropriately. Accordingly, everyone involved with committees, advisory groups, peer reviewing, providing expert advice and representing service users in the Evidence Directorate must declare all relevant interests. The aim of this policy is to increase transparency in the processes followed by, and to increase confidence in the impartiality of outputs from, the Evidence Directorate.

2. Scope

This policy applies to Chairs and members of committees and groups in the following divisions of the Evidence Directorate:

- Scottish Antimicrobial Prescribing Group (SAPG)
- Scottish Health Technologies Group (SHTG)
- Scottish Intercollegiate Guidelines Networks (SIGN)
- Scottish Medicines Consortium (SMC), and
- Standards and Indicators (S&I).

It also applies to people assisting these groups by peer reviewing documents, providing expert advice and representing people with lived experience including patients.

3. Who needs to submit a DOI?

While anyone who is involved with an output from the Evidence Directorate must submit a declaration of interests (DOI), they will fall into one of three categories. These are:

- General annual declarations from permanent members of groups/ all staff involved with work relating to the programmes outlined in section 2 of this policy
- topic specific declarations from SIGN guideline development group members, standards development group members, peer reviewers, or experts for all groups, and
- topic specific declarations from representatives of people with lived experience including patients.

There is a separate form for each of these groups.

Only when a fully completed DOI form is submitted can an individual participate in meetings, advisory groups or contribute to the production of an Evidence Directorate output related to the specified programmes.

4. Annual declarations from staff or members of permanent groups

A general annual DOI must be completed when a new staff member begins their employment or when a member joins a group. This DOI will be checked at the start of every financial year by a designated staff member from each unit. This can be achieved by a new declaration or from confirmation of an excerpt sent to the member.

If a member becomes aware of a new interest which could be perceived as a conflict it is their responsibility to disclose this before the next annual declaration. Please see the Healthcare Improvement Scotland employee code of conduct for further information.

While members of SIGN guideline development groups and standards development groups are often members for a number of years, they will be treated in the same manner as peer-reviewers and experts (detailed in section 6) as advisory groups are topic specific.

5. Storage and publication of annual declarations from staff or members of permanent groups

It is the responsibility of each unit to collate all the interests of their members and to screen these for any irrelevant information. Once the interests for each group are collated, screened by the programme manager and unit head, they will be sent to the central repository of the Evidence Directorate for storage. Only the head of the Knowledge and Information Unit will have write access to the central repository but all staff will have read access. Annual declarations will be published on the Healthcare Improvement Scotland website annually. In line with Healthcare Improvement Scotland's retention policy, declarations will be deleted from the central repository after 5 years.

6. DOI collection process for peer-reviewers, experts, and members of a Standards or Guideline Development Group

A full DOI must be collected before peer-reviewers and experts receive project documents. See the respective standard operating procedure for individual Healthcare Improvement Scotland products for guidance on how interests declared by reviewers and clinical advisors contributing to the different products and projects should be managed.

Members of SIGN guideline development groups, and standards development groups who are active for more than one year must have their DOI reviewed annually in the same process as outlined in section 4 of this policy.

The Chair and the Unit Head of a work programme, have the discretion to include an expert, who would normally be excluded due to an interest, where the expert is the only source of advice available and the work at hand would be seriously compromised without their testimony. If such an expert is invited to peer review a waiver needs to be signed by the Unit Head. If such an expert is invited to a meeting then a waiver needs to be signed by the Chair and the Unit Head.

7. Topic specific verbal confirmation at meetings and publication of topic specific register of interests

A register of interests of all individuals involved in a topic will be generated prior to a committee or advisory group meeting and supplied with the meeting papers. At the start of every meeting, each person present must verbally confirm if their interests are accurate or if they have anything additional declarations. Each response must be minuted and additional interests added to the register which is stored with the meeting's documents. If no additional interests are declared this will be recorded in the minutes. See 'Declaration of interests: definitions and policies on handling interests at meetings' for guidance on handling different categories of interests at different Evidence Directorate meetings.

After completion of the project the topic specific register will be screened by the project lead and programme manager of the relevant Evidence Directorate unit and published on the Healthcare Improvement Scotland website.

Topic specific registers for SIGN guideline development groups and Standards development groups will be published on the Healthcare Improvement Scotland website on an annual basis, and the final register published after the project is complete.

8. Private information declared in interests

People may declare information which is private. This could be in an interest which is relevant or it could be information which is irrelevant. When the returned declaration of interest form is initially read if the information is deemed irrelevant to the purpose of declaring then it will not be recorded. If the information is deemed relevant then it will be recorded.

9. Chairs of meetings and advisory groups

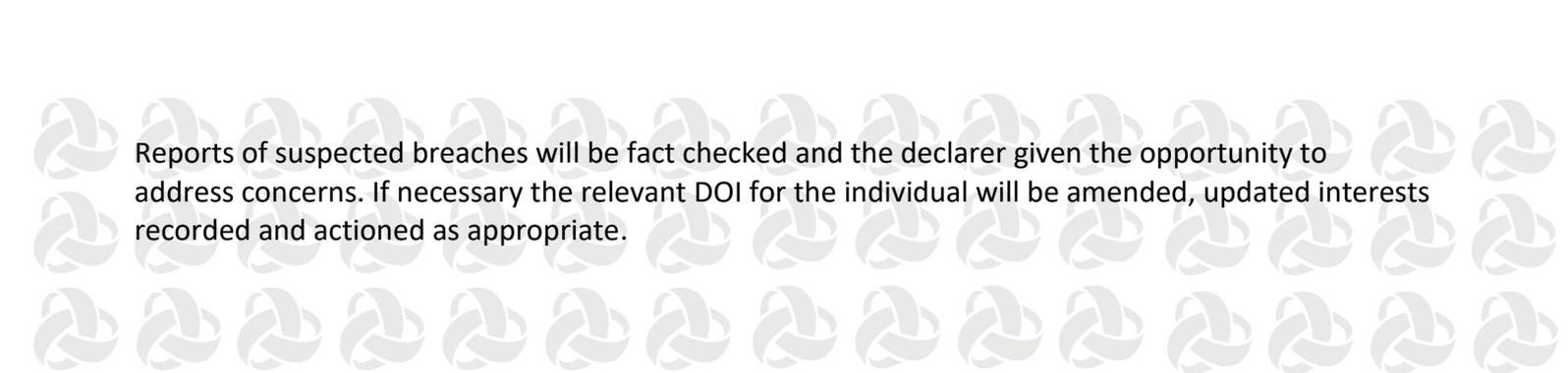
Due to the nature of Chairs being experts in their fields they will often have interests in the topics. If they have an interest which would normally warrant exclusion from a meeting or agenda item, and the relevant Healthcare Improvement Scotland unit does not want the Chair to be excluded, then a waiver must be signed by the Director of Evidence prior to the meeting. It is the responsibility of the Chair to seek this out.

10. Collection of DOIs for bespoke pieces of work

The Evidence Directorate is from time to time asked to produce work which does not fit the profile of a product with an established process. In this situation the responsibility of DOI lies with the work stream lead. The work stream lead has the responsibility to decide if the collection of DOI from those involved with the work/product is appropriate and how to deal with any interests declared. This should be in line with this policy.

11. Breaches of interests

There may be situations when interests are not identified, declared or managed appropriately. This may happen innocently, accidentally or deliberately. For the purposes of this policy, these situations are referred to as 'breaches'. All involved with the work of the Evidence Directorate are obligated to report suspected breaches and should be reported to the Chair of the group or the Unit Head.



Reports of suspected breaches will be fact checked and the declarer given the opportunity to address concerns. If necessary the relevant DOI for the individual will be amended, updated interests recorded and actioned as appropriate.