

BMJ Group policy on declaration of interests

The BMJ Group is committed to ensuring the independence and integrity of our content, products, and services. We strive, therefore, 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 interests should I declare?

We want to hear about interests that might conflict with the work you are doing or have been asked to do for the BMJ Group. A conflict of interest arises when a person has a personal or organisational interest that may influence or appear to influence the work they are doing. Usually this is a financial interest, but it may also be non-financial.

Above all we want transparency about any personal or organisational interests that might be seen as a conflict of interest in relation to the task a person is being asked to do for BMJ Group.

Conflicts of interest are often unavoidable, and should 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 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 someone using 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 and specific 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.

2. How we categorise declaration of interests

We categorise declaration of interests into four main areas:

2.1 Personal financial interests

A personal financial interest is considered present 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 stocks and shares, patents, or other assets.

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 a medical education promotional or communications company

We do not consider personal financial interests to be present in the case of assets over which individuals have no control, such as unit trusts, occupational pension funds, and accrued pension rights.

2.2 Organisational financial interests

An organisational financial interest is said to exist 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

2.3 Non-financial interests

Non-financial interests can take many different forms, including personal or professional relations with organisations and individuals. 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. We would also want to know about strongly held beliefs where they are relevant to the task in hand.

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

2.4 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 do for the 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.

3. When will you be asked to make declaration of interests?

We expect people to declare their interests before taking up any work for the BMJ Group or entering into a contract with us for your services.

Where we are recruiting new staff, a declaration of interests will be 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.

Articles submitted for consideration must be accompanied by a completed declaration.

BMJ Group staff and members of advisory boards will be asked to review their declarations of interests annually (for staff this will be at the time of appraisal).

4. 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, such as 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 individual who has disclosed them by the person who has asked them to do the work for the BMJ Group.

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. For BMJ Group staff this would be the person that they report into.

There would be a right for anyone considered to have a conflict of interest sufficient to preclude them from working with the BMJ Group on a particular task 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.

5. 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.

6. What happens to declarations?

Whenever possible, we will publish declarations 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 declarations of interest annually. Signed declarations from BMJ Group Staff will be kept by the Human Resources department in accordance with our information governance policy.

Where material is peer reviewed, requests for declarations will be sent to the peer reviewers, and editors will send any author declaration of interest statements to the peer reviewer.

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. February 2013

BMJ Group declaration of interests statement

Please complete the declaration below. You may complete and return this form electronically in Word format—a physical signature/hard copy is not required.

I have read and understood the BMJ Group policy on declaration of interests and declare the following interests: *[list them or state "none"]*.

Name:

Date:

Manager sign off (for internal use)

Comments:

Review date

Name:

Date:

[For internal use]

Guidance on how to apply the BMJ Group declaration of interests policy

This policy applies to people involved in the conception and creation of content and services or making major business decisions on that content or services

Who is responsible for getting the declaration of interests?

- 1) Products and services (boards and advisors): the editorial director of the product of service, or his or her delegate
- 2) Content or events (authors, speakers and reviewers): the commissioning/handling editor
- 3) Advice: the person getting the advice (e.g. an editor)
- 4) Staff: HR is responsible for getting declaration of interests when a new staff member arrives and the line manager is responsible for existing staff. Staff will be told to read the policy and (in line with the Business ethics policy) to inform their manager at any time if they have any personal interest which might affect, could be seen to affect or leave them open to allegations that this could affect their impartiality about the work they are doing.

How/when will the declaration be obtained?

- 1) Product or service—at the time of convening of boards and advisory groups, and when new members are recruited
- 2) Content or event—at commissioning or (for research and other unsolicited content) at submission
- 3) Advice—on requesting the advice
- 4) Staff—as part of their application for the job.

What should be done with the information?

The person responsible for getting/receiving/using the information provided in the declaration should ask themselves: does anything in this declaration compromise the person's ability to do the task that needs doing—or could be perceived as compromising this. If the answer is yes or possibly, the responsible person should discuss it with their line manager or other appropriate person. Practices may differ between products and department – the point is that there should be some discussion about this before a decision is made and there should be some documentation of the decision, the decision making process, and the reasons for the decision.

What constitutes “a conflict of interest too far” will differ according to the task the person is being asked to do. As far as possible the types of interest that we have agreed constitute a “conflict of interest too far” will be listed within the quality indicators for individual products and services. At a Group level they would be anything that interferes with the unbiased output of the BMJ Group. This is likely to occur if the person declares a current financial relationships or contractual arrangements that appear to prevent him or her 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, or where he or she is in receipt of significant personal financial benefits.

Where will the declaration be published?

- 1) Product or service—on the relevant website
- 2) Content or event—alongside each article/module or at the beginning of each talk
- 3) Advice—to those receiving the advice (e.g. to authors and editors in the case of reviews)
- 4) Staff—to line managers and department heads, and on the relevant website for staff making editorial or business decisions (generally staff in grade 4 or above).

How often should declarations be reviewed?

- 1) Product or service—annually
- 2) Content or event—for content that is formally updated: at every updating
- 3) Advice—at least annually for on-going advisors. (For advisors who sit on boards or committees updating declarations should be an agenda item at committee meetings at appropriate intervals, but should be considered formally at least annually)

4) Staff—at every annual appraisal. Staff have an obligation to tell their manager at any time if the information changes.

What happens if a person fails to make a full declaration of interests?

If we are alerted to the fact that someone may have an undeclared and potentially conflicting interest, this will almost always require careful handling. The first step is almost always to raise the concern with the person involved and ask if the conflict does exist and for their reasons for not declaring it. Based on their response various actions may follow. Their declaration of interests may simply need to be updated or a clarification notice or response published. Where a conflict is substantial and risks the integrity of the content, product, or service, the person is likely to have to be removed from undertaking the relevant task and articles or other content they have been working on may need to be retracted. Such cases must be discussed with senior staff (the line manager in the first instance) and records kept of all decision making.

When documenting the decision making process care should be taken to only record the facts of the case under review and to avoid any speculation or making any personal comments about a person's declaration of interests.

FG, LD, RM December 2012