



Process for declaring interests and dealing with conflicts of interest

Contents

1. Scope	3
2. Applying the Process	4
2.1. Types of Interest	4
2.2. Who should declare?	6
2.3. When should interests be declared and what action is required?	6
Appendix 1: PICANet Declaration of Interests Form	7
Appendix 2: DOI register template	9

1. Scope

1.1 As a matter of good governance, it is important for the Paediatric Intensive Care Audit Network (PICANet) to demonstrate probity in the way it conducts its business. An important part of this commitment is the requirement to demonstrate objectivity and integrity. The identification and management of any declarations and then potential conflicts of interest is an important part of ensuring high standards of probity.

This document is written for the members of PICANet oversight groups (namely the Steering Group and Clinical Advisory Group) and describes the:

- Circumstances in which people should declare an interest that might conflict, or be perceived to conflict, with their duties and responsibility to PICANet.
- Process and provides guidance on what interests need to be declared, who needs to declare them, when and what actions should be taken to manage declarations and avoid conflicts of interest influencing the conduct of PICANet's business.

1.2 It is acknowledged that members of the PICANet oversight groups have a good understanding of healthcare work, including healthcare industries, professional bodies (for example Royal Colleges), professional associations, universities, the NHS, advocacy groups with a primary focus on health or public health, and private healthcare organisations. To avoid public concern that financial or other interests might prejudice the advice provided to PICANet, the arrangements, processes and activities should be transparent and freely available for public scrutiny.

1.3 PICANet employees are subject to their respective organisation's policies¹ relating to declaring interests and dealing with conflicts of interest so this managed outwith the scope of this policy.

1.4 PICANet is keen to ensure transparency. This process document is available on the PICANet website and the Declaration of Interest (DOI) register is available on request.

1.5 Having identified a conflict of interest, those responsible for the administration of this process must act only in the best interests of the work or business under consideration. This means that they must consider the issue of the conflict of interest so that any potential effect on decision making is eliminated. How they prevent the conflict from affecting decision making will depend on the specific circumstances.

¹ [University of Leeds Policy Statement on Professional Integrity in Research](#) and [University of Leicester Registrations and Declarations of Interest Policy](#)

In part, this is achieved by having a formal process that ensures that interests are routinely declared as part of PICANet business activity and that that declaration is considered against the types of interests outlined in this process and appropriate action is taken and recorded. The process indicates that declarations of interest should be declared initially for all PICANet oversight group members (at the time of implementation of this policy or upon joining the oversight groups). Thereafter the register of interests should be reviewed as a standing agenda item at each meeting any new DOI should be declared.

1.6 The determination of whether or not a 'declared' interest constitutes a 'conflict' of interest in relation to the specific PICANet activity under consideration will involve the careful application of this process document and may require careful judgement by the Chair of the relevant oversight group based on the facts provided. Declarations should be considered in light of risk to the PICANet activity under consideration and the broader reputational risk to PICANet. Where there is any doubt, this may be best determined by considering how the interest may be perceived by a member of the general public.

1.7 All those involved in PICANet business should consider carefully if they have an interest in which they are engaged that might unduly influence their judgement and objectivity. Particular care should be taken if the interest declared involves any payment or inducement from the commercial sector or if there is any reputational interest related to positions held in other organisations. Similarly, publications authored or publically expressed opinion on the issue or business under review should be considered.

2. Applying the process

2.1 Types of Interest

This process document is intended as a guide to the kinds of interests that should be declared. When sending out a declaration of interest form (appendix 1), this process document should be sent with the form.

If in doubt, all interests should be declared. If there is uncertainty about whether an interest should be declared, please seek advice from the following people:

- Chair of the relevant oversight group (Steering Group of Clinical Advisory Group)
- PICANet Operations Development Manager.

The PICANet Principal Investigators act as final arbiters if there is uncertainty or unresolvable disagreement over the classification and relevant action linked to a declaration of interest.

Interests can be specific or non-specific and financial or non-financial. Financial interest can be personal or non-personal. An interest is considered 'specific' if it is related directly to the matter, work programme or service under consideration. An interest is 'non-specific' if it does not relate directly to the matter, work programme or service under discussion. Definitions are provided in table 1.

Table 1	
FINANCIAL	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
Personal financial interest	Where there is or appears to be opportunity for personal financial gain or financial gain to a direct family member.
Non personal financial interest	Where there is payment or other benefit to a department or organisation in which the individual is employed but does not receive personally.
NON FINANCIAL	
Personal non-financial interest	Where there is opinion on the matter, work programme or service under consideration or where personal relationships exist linked to the matter

2.2 Who should declare

This process applies to members of PICANet oversight groups (namely the Steering Group and Clinical Advisory Group).

2.3 When should interests be declared and what action is required?

Declarations of interest should be declared initially for all PICANet oversight group members (at the time of implementation of this policy or upon joining the oversight groups) using the Declaration of Interests form (Appendix 1) and added to the Register of Interests for the group (Appendix 2).

Thereafter the Register of Interests for the group should be reviewed as a standing agenda item at each meeting any new DOI should be declared. It is the responsibility of each individual member to maintain the accuracy and timeliness of their declaration and to notify the group Chair and PICANet of any changes.

Table 2 sets out the type of declaration and the action required.

Table 2	
Type of interest	Action
FINANCIAL	
Personal financial specific interest	Declare and withdraw from activity and engagement. May respond to enquiries if approved by group Chair.
Personal financial non- specific interest	Declare. Activity and engagement unaffected.
Non personal specific financial interest	Declare. Activity and engagement unaffected unless, exceptionally, the Chair rules otherwise.
NON FINANCIAL	
Personal specific non-financial	Declare. Activity and engagement unaffected unless, exceptionally, the Chair rules otherwise

Appendix 1: PICANet Declaration of Interests form

PICANet Declaration of Interests form

All interests that might unduly influence an individual's judgement and objectivity in the conduct or oversight of PICANet business should be declared. If in doubt, please declare all interests.

Particular consideration should be given to interests involving payment or financial inducement or any reputational interest that might affect the business under consideration.

The 'PICANet Process for declaring interests and dealing with conflicts of interest' document should be read in conjunction with this form as this provides details of the process and defines the types of interest that should be declared.

I declare that I have read and understood the PICANet 'Process for declaring interests and dealing with conflicts of interest' and am willing to abide by it. I wish the following interests to be recorded in accordance with the relevant provisions of the process document. I am aware that failure to declare relevant interests may result in being asked to step down from the role/activity being undertaken.

Time period for relevant interests is 12 months before involvement in PICANet business.

Name:	Member of PICANet Oversight Group: Steering Group / Clinical Advisory Group *
Date:	
* Delete as appropriate	
Declaration of interests:	
Signature:	

Information provided within this form will be processed in line with the PICANet Collaborators Privacy Statement which can be found on [the PICANet website](#).

PICANet Definitions of Types of Interests	
FINANCIAL	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
Personal financial interest	Where there is or appears to be opportunity for personal financial gain or financial gain to a direct family member.
Non personal financial interest	Where there is payment or other benefit to a department or organisation in which the individual is employed but does not receive personally.
NON FINANCIAL	
Personal non-financial interest	Where there is opinion on the matter, work programme or service under consideration or where personal relationships exist linked to the matter

Appendix 2: DOI register template

PICANet Steering Committee / Clinical Advisory Group DOI Register

Name	Membership start date	Membership end date	Date DOI made	Declaration	Classification	Action taken