

**Policy for Declaring Conflict of Interests for Canadian Dermatology Association's
Clinical Guideline Authors**

June 2019

1. Scope

- a. This policy is aimed specifically at all named authors of the Canadian Dermatology Association's (CDA) clinical guidelines as published in the *Journal of Cutaneous Medicine and Surgery* (JCMS), i.e. all members of a Guidelines Development Group (GDG). This policy document describes what interests need to be declared, who needs to declare them and when, and what action should be taken to avoid any conflict of interest (COI) influencing the conclusions of the evidence and the recommendations made in CDA guidelines. Everyone referred to in this policy should ensure that they and those for whom they have responsibility understand their obligations to disclose all relevant interests.
- b. In this policy document, the definition of terms set out below will apply:

'Commercial sector' encompasses:

- companies, partnerships and individuals who are involved in the development, manufacture, promotion, sale or supply of products or services which are advertised, promoted or marketed as treatments or as products contributing to the promotion or maintenance of good health
- companies involved in the sale of products which affect public health substantially, such as the food, alcohol and tobacco industries
- trade associations, both in Canada and elsewhere, representing companies involved with such technologies, products and services
- private social care providers
- physicians with a financial interest in an associated pharmacy or for-profit firm providing health related services.

'Competitor interest' refers to:

- an interest in a company which produces a product which is a competitor to the one(s) under consideration in guidance being produced and whose position is likely to be influenced significantly by the guidance.

'Professional Organisations' refer to:

- any organisation engaged in the medical, public health or social care sectors including medical and nursing colleges, research organisations, and universities
- any other bodies with whom the CDA has a relationship or with whom the CDA is considering entering a relationship.

‘Voluntary organisation’ refers to:

- organisations that are ‘not-for-profit’ and ‘non-governmental’, and includes advocacy groups (whose functions include speaking for and on behalf of individuals and groups with an interest in health or health-related matters), charities and community groups.

‘Family members’ refer to:

- a spouse or partner living in the same residence as the individual, as well as children and adults who may or may not be living in the same residence for whom the individual is legally responsible, (for example, an adult whose full power of attorney is held by the individual).

‘Matters under discussion’ refer to:

- not mutually exclusive or limited to the guideline topic and scope, *a priori* questions and associated ‘protocols’ resulting in systematic review work.

2. Who is covered?

All named authors of a GDG, which may include the following (but not limited to):

- CDA members
- nursing representatives
- other professionals or professional organisation representatives
- patient representatives
- CDA members of staff or other guideline technical support personnel.

3. What interests are involved?

- a. GDG members can have a range of experiences and interests, arising from different contexts and activities done in a professional and personal capacity. This can include employment and other sources of income, speaking engagements, shareholdings, publications and research, and membership of professional or voluntary organisations. Having varied interests is a positive attribute, but it is vital that interests are openly declared so they can be appropriately managed. Declaring an interest does not mean there is a conflict of interest.

The following is intended as a guide to the types of interest that should be declared. Neither an individual covered by this policy document nor the CDA is obliged to search for links between a GDG member and the commercial sector in which they have a connection or interest. Although particular attention is given to GDG members’ financial interests, the CDA is also conscious that risks to an individual’s reputation could also be (or be perceived to be) prejudicial to their advice. Therefore, arrangements covering ‘reputational risk’ are also considered in this document (see section 3.e).

- b. Interests can be:
 - **specific** (if it refers directly to the ‘matters under discussion’ which include anything that can relate to, or inform, a potential recommendation) or **non-specific** (if it does not refer directly to the ‘matters under discussion’)
 - **financial** (payments received in cash or in kind) or **non-financial** (‘reputational risk’)

Financial interests can be:

- **personal** (payments received personally in cash or in kind) or **non-personal** (payments not received personally in cash or in kind).

The different types of interest are explained below.

- c. A **personal financial interest** is one where there is or appears to be opportunity for personal financial gain, or financial gain to a 'family member' (see section 1.b) in the 24 months prior to joining the GDG and during the period of GDG membership. Financial interest means 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:

- any consultancy, directorship, position in or work in the commercial sector (which is specific to the matters under discussion) that attracts regular or occasional payments or benefits in kind, such as hospitality
- GDG members receiving payment from the commercial sector for undertaking a procedure while giving advice on that procedure to the CDA
- any fee-paid work commissioned by the commercial sector for which the GDG member receives payment or financial benefit in kind
- a financial interest in a company's product that is, or may become, a competitor to the product(s) under consideration
- expenses or hospitality provided by the commercial sector required for meals, travel and accommodation beyond that is reasonably required (i.e. anything above \$150 CAD per day for meals, standard or economy class rail or air travel, \$300 CAD per night for hotel accommodation) to attend meetings and conferences as invited speakers or as delegates
- any shareholdings in the commercial sector held by the GDG member or their family member
- funds which include investments in the commercial sector that are held in a portfolio where the GDG member has the ability to instruct the fund manager as to the composition of the fund.

No personal financial interest exists in the case of:

- assets over which the GDG member has no financial control (e.g. wide portfolio unit trusts and occupational pension funds) and where the fund manager has full discretion as to its composition
- accrued pension rights from earlier employment in the healthcare industry
- payments received from the commercial sector that have been donated to charity (see 3(e) personal non-financial interest).

- d. A **non-personal financial interest** involves payment or other benefit to a department or organisation in which the GDG member is employed but which is not received personally, in the 24 months prior to joining the GDG and during the period of GDG membership:

- a grant from the commercial sector for the running of a unit or department where the GDG member is employed
- a grant or fellowship or other payment from the commercial sector to sponsor a post or member of staff in the unit where the GDG member is employed

- the commissioning of research or other work by, or advice from, members of staff who work in a unit where the GDG member is employed

N.B. GDG members covered by this policy document are not obliged to seek out knowledge of work done for, or on behalf of, the commercial sector within the departments where the GDG member is employed, if normally they would not expect to be informed.

- e. A **personal non-financial interest** refers to an opinion on the matters under discussion published in the 24 months prior to joining the GDG and during the period of GDG membership:
- a clear opinion, reached as the conclusion of a research project, about the clinical and/or cost effectiveness of an intervention under review
 - a published statement in which the individual has expressed a clear opinion about the matters under discussion, which could reasonably be interpreted as prejudicial to an objective interpretation of the evidence
 - authoring or co-authoring a document submitted as an evidence publication
 - holding office in a professional organisation (see 1.b), charity or advocacy group with a direct interest in the matters under discussion
 - other 'reputational risks' in relation to the matters under discussion, including monies received from the commercial sector which in turn are donated to charity or hospitality given in kind.

4. When should interests be declared and what action is required?

All potential GDG members will need to fill in the online COI declaration for clinical guideline authors form prior to the GDG being formed. The declarations will be evaluated against the conditions and exclusions (see 5.c).

Subsequent declarations will be made, covering the preceding 24 months:

- ahead of GDG meetings where recommendations will be formulated
- prior to the submission of the guideline manuscript to the JCMS.

Declared COIs that will be featured in the final guideline will be those that have arisen 24 months prior to the commencement of and during the guideline development.

5. Conditions and exclusions

The following are mandatory:

- a. Individuals with the following types of personal financial interests shall not take part in guideline development:
- any shareholdings in the commercial sector held by the GDG member or their family member
 - funds which include investments in the commercial sector that are held in a portfolio where the GDG member has the ability to instruct the fund manager as to the composition of the fund.
- b. GDG members with any:

- specific personal financial and non-financial interests during and 24 months prior to the commencement of the guideline work shall not chair a GDG meeting
 - specific personal financial interests during and 24 months prior to the commencement of the guideline work shall not be the first or last author of the published guideline.
- c. A GDG should consist of a minimum of 51% of members with no specific personal or non-personal financial interests.
- d. In formulating recommendations for guidelines, the chair should consider whether members with COIs should take part in the proceedings – the actions required at GDG meetings are outlined in the table below:

Type of interest		Action
Personal financial	Specific	Declare and leave the meeting. In exceptional circumstances* the chair may rule that they can remain to answer specific questions
	Non-specific	Declare and participate unless the chair rules otherwise
Personal non-financial	Specific	Declare and wait for chair to rule
	Non-specific	Declare and participate unless the chair rules otherwise
Non-personal financial	Specific	Declare and participate unless the chair rules otherwise
	Non-specific	Declare and participate unless the chair rules otherwise

* For example, if the CDG member is the only expert in the country on a particular topic being discussed.

- e. All GDG members should stop accruing COIs during the development of the guideline so as to be able to participate fully in meetings. Any new COIs acquired during the guideline development should be declared.

The CDA will assist GDG members with their declaration of interests.

6. Record of interests and their publication

A record is kept of the:

- names of GDG members who have declared interests
- names of relevant products and companies
- nature of all declared interests, including type and specificity
- dates for each declaration.

The information is held at the CDA and is available for inspection, upon request.