

## ***BSACI INDUSTRY INTERACTION POLICY***

### **1. INTRODUCTION**

1.1 The BSACI and industry have agendas which overlap with respect to improving patient outcomes through high quality treatments and management. However, we are motivated by different factors. BSACI exists to improve allergy care for patients with allergic diseases, by supporting its members who provide that care, ensuring they provide independent advice and expertise so that patients are able make an informed decision about their own health. Industry seeks to benefit its shareholders by means of sales and marketing of their products. Working with industry can bring real benefits to patients but must not compromise the integrity and independence of BSACI members, staff and external agencies/individuals appointed by the BSACI.

1.2 The relationship between industry and healthcare professionals is increasingly scrutinised and many documents have been developed as to how healthcare professionals conduct themselves when working with industry, to reduce unconscious bias and mitigate against the well-recognised conflicts of interest that can arise. This policy has been informed by the British Thoracic Society's document "BTS and Biomedical Industries Policy: Joint working and Funding Relationships".

1.3 In 2019, the BSACI Council agreed that clear guidance was needed to set out the principles by which the organisation will interact with industry in a way which enables accountability, probity and transparency. A 'Working Party' was established to define future options for the way in which the BSACI should interact with industry for the benefit of patients, in line with the BSACI's Organizational Values. A survey to the BSACI membership was undertaken, highlighting the areas in which the BSACI currently accepted funds from industry, and asking members to choose options which were most aligned to their own values. These results have been used to inform this policy and to define the way in which the BSACI accepts support from industry.

1.4 This policy will be reviewed annually and amended (if needed) by agreement of BSACI Council.

## 2. SCOPE

2.1 The purpose of this document is to highlight areas in which the BSACI seeks to ensure accountability, probity, and transparency in relation to its activities. It encompasses the BSACI Annual Meeting (both with respect to sponsorship and speakers), education programmes, guideline development and committees. As the policy is implemented, the scope may widen.

2.2 This policy is intended to inform those working for and with BSACI (including BSACI professional staff, members acting on behalf on the BSACI, and external agencies contracted by the BSACI) when working with industry: including, but not limited to, pharmaceuticals, milk-formula companies, and other commercial entities such as diagnostic or medical device companies. The same principles apply irrespective of the nature of the company, as well as their agents, companies who offer consultancy, product development, and for members who provide these services as directors of limited companies.

2.3 There are additional concerns with respect to working with formula milk companies, as outlined by the World Health Assembly (WHA) in a 2016 clarification of the International Code of Marketing of Breastmilk Substitutes (“The WHO Code”) (WHA Resolution 69.9). The BSACI recognises that the best opportunity to improve the health and well-being of infants and young children is through promotion of breastfeeding. For infants with milk allergy who are unable to breastfeed, specialist milk formulas can be crucial in maintaining their health. BSACI agrees with the recommendations of WHA Resolution 69.9, which include the stipulation that formula milk companies should not provide any information for health workers other than that which is scientific and factual, or sponsor meetings of health professionals and scientific meetings. As a result, in 2019, the BSACI Council took the decision that the society would no longer accept direct funding from formula milk companies. This enables the BSACI to remain wholly independent in the critical area of infant feeding. The BSACI will continue to engage, debate and collaborate with infant formula milk companies, but will no longer have any form of commercial relationship with them.

Where a formula milk company has a subsidiary which is not involved in infant feeding products, BSACI may establish a financial relationship with the subsidiary in relation to non-feeding products, so long as this relationship is consistent with this Policy document and is governed by the relevant Industry code e.g. the Association of the British Pharmaceutical Industry (ABPI) code of practice.

This decision does not affect individual members, who may continue to make personal decisions around whether they accept funding from formula milk companies, although the society does expect this to be openly declared, where appropriate.

2.4 This document covers the following areas;

- BSACI Values and general principles
- Industry support
- Education Programmes including the BSACI Annual Meeting; local and national meetings (both face-to-face and virtual); training days for trainees.

- Transparency: both with respect to the organisation, but also the senior leadership team (Trustees, CEA Editor), BSACI Staff, Guideline Development Committee, and invited Speakers
- Breaches and potential sanctions
- Implications for patients

2.5 All members of the BSACI Council, Sub-Committees (including the Standards of Care Committee and Guideline Writing Groups (GWG)) and BSACI Staff are required to declare commercial and other relevant interests each year, using the BSACI Declarations of Interest form(DOI) in line with the BSACI Conflicts of Interest (COI) Policy, which can be found [here](#). Currently DOI forms for the BSACI’s Trustees are published on the BSACI website [here](#). The aim is to include all BSACI Council members DOIs also. All forms are held at the office and are available on request by emailing [info@bsaci.org](mailto:info@bsaci.org)

2.6 The BSACI does not invest or accept income from companies directly involved in:

- the manufacture of tobacco
- pornography
- the production of fossil fuels
- the manufacturer or distribution of breast milk substitutes or infant milk formulas

The ethics of our investment portfolio will be reviewed every two years, or sooner if appropriate.

### 3. VALUES

Our values form the foundation for our work and guide us when developing policies that shape the way the society evolves. Our values are:

#### ▶▶ **Trusted**

- As professionals and practitioners – We demonstrate integrity, probity and independence in our work.
- As experts – We are qualified to provide expert opinions and we make decisions based on scientific evidence for the benefit of our patients.
- As colleagues – We offer a safe, supportive environment for members to share challenges and learn from each other.

#### ▶▶ **Connected**

- We provide an interface across disciplines, professions and specialities in the field of allergy.
- We are an inclusive, responsive society for our members.
- We ensure that our work is informed by current research and new thinking in our field.
- We connect with others to increase our impact and influence to bring about change.

## » Forward Thinking

- We provide leadership and advocate for change to improve allergy care and develop the practice of allergy and clinical immunology.
- We inspire, develop and implement best practice in our fields of work.
- We provide specialist education and learning opportunities to support our members' professional development.
- We drive improvements in allergy management through education, training and research and by collaboration with patient groups, policy makers and other stakeholders.

## 4. SINGLE COMPANY FUNDING

4.1 To ensure there is no perceived bias, BSACI shall not accept funding from one company only for any of the work it carries out.

## 5. COMMERCIAL SUPPORT FOR THE BSACI ANNUAL MEETING

The BSACI Annual Meeting, is the flagship meeting of the society. It provides a platform for research and new advances in allergy, as well as networking opportunities for its members, healthcare professionals and the wider allergy community.

### 5.1 Sponsorship

The BSACI welcomes sponsorship of its Annual Meeting, so long as this adheres to the terms of this policy.

### 5.2 Industry Exhibitors

It is important for healthcare professionals to be able to access and interact with companies whose products and services offer benefits to patients. This can be undertaken in the designated exhibition area. Industry exhibitors will be situated in the exhibition area, and while exhibitors will have access to sessions during the Annual Meeting, this will be as observers and they will not be able to contribute to session discussions. Company representatives are expected to adhere to the principles of the Association of the British Pharmaceutical Industry (ABPI) code of practice (or equivalent codes for non-pharmaceutical companies) in relation to their interaction with healthcare professionals.

### 5.3 Industry Symposia

The BSACI recognises the benefits and risks of having industry-sponsored symposia taking place at the same time as its Annual Meeting. This enables delegates to learn more about the products and medicines that may benefit patients, as well as subsidise the cost of the Annual Meeting. Industry symposia are organised independently of the BSACI, are not included in the main conference programme, and must not be advertised in any way that suggests they have been organised by BSACI. The organisers and any symposium speakers will be required to adhere to the requirements of this Policy, including a declaration of competing interests.

## **5.4 Promotional material**

Promotional material developed by companies will be restricted to the exhibition area of the Annual Meeting, and only distributed within the exhibition area (they will not be distributed by the BSACI), by the industry representative. However, promotional material, as long as clearly labelled as originating from the company, may be distributed in the room during the time the company symposium is taking place and removed at the end of the symposium.

## **5.5 Sponsorship of individual participants**

The BSACI does not restrict the ability of its members or other participants to obtain sponsorship to attend its Annual Meeting or other events, although the society does expect this to be openly declared, where appropriate.

## **6. EDUCATIONAL PROGRAMMES**

Notwithstanding the restrictions against direct funding by formula milk companies (see 2.3), sponsorship of BSACI educational programmes from non-formula milk companies (for example, regional primary care training days, local one-day meetings/workshops - both virtual and in person, trainee education days) is acceptable as a means to subsidise the cost of attendance.

Educational events may be co-badged with sponsors, but only where this is being provided by more than one company. Company stands are acceptable (if applicable) but must be in a separate area from where the educational content is delivered. Promotional material relating to the event must state, in a non-promotional statement, details of the companies providing support to ensure visibility and transparency.

## **7. EDUCATIONAL CONTENT and DEVELOPMENT (including BSACI Annual Meeting)**

### **7.1 Programme Development Committees**

The public have a right to expect that those who are involved in the development of educational programmes (which include both BSACI members as well as non-members) will develop content that is in the best interest of patients. Those involved in the programme are required to complete a 'Declarations of Interest' (DOI) form. At the discretion of the Committee Chair, Committee members with a potential conflict of interest can still be involved in the development process (having declared their interest on their form). Completed DOI forms will be reviewed by the Chair before the start of each meeting and any potential competing interests declared at the start of the meeting. DOI forms are available from the BSACI Head Office and a copy of the BSACI 'Conflicts of Interest' policy can be found [here](#).

### **7.2 Training in managing potential conflicts of interest**

To ensure patients have the confidence that members act independently and are transparent in declaring any competing interests, the BSACI will provide training on working with Industry and how to manage 'conflicts of Interest and transparency'. This training will be also incorporated into the programme provided by BSACI for Trainees.

## **8. TRANSPARENCY**

All dealings the BSACI has with external parties should be undertaken with transparency and professionalism. The BSACI actively seeks funding and donations as a method of supporting its work and reducing the costs of its services to the benefit of its members. Any pharmaceutical companies providing funding to the BSACI must follow the ABPI Code of Conduct. Non-pharmaceutical companies are expected to adhere to the principles of the ABPI Code of Conduct where an equivalent code does not exist.

### **8.1 Organisational transparency**

The BSACI Funding Sources section on the website lists funders from whom the BSACI has received income in the previous calendar year and the reason for the income.

### **8.2 Transparency relating to individuals**

A conflict of interest exists when professional judgement, for example concerning a presentation or critical appraisal of research evidence or discussion about the most appropriate management of a clinical case, may be influenced by a secondary interest (such as direct or indirect financial gain).

An obvious example of a conflict of interest would be an allergist employed by a pharmaceutical company presenting data on a drug developed by his/her own company or by a rival company. Other examples include receiving funds for research, or consultation fees, from any organisation that might have a financial interest in the material being presented. Other types of competing interest exist and might be important (such as professional rivalry between two research teams working on the same topic). However, for the purpose of this declaration, only financial competing interests need to be considered.

### **8.3 Trustees and Editor of *Clinical & Experimental Allergy***

BSACI does not place restrictions on its Trustees and Editor of CEA when working with industry on a personal level. As with all members, if the Trustees or Editor of CEA choose to work with industry, it must be made absolutely clear to the company that they are doing so in a personal capacity and not as a representative of the BSACI.

### **8.4 Transparency in relation to those who serve on BSACI Standards of Care Committee and guideline development groups.**

Clinical Guidelines are produced to optimise patient care. They are an important part of clinical governance and provide a systematic and transparent method by which organisations can promote evidence-based practice. The methodology by which the BSACI develops its guidelines is accredited by NICE. The principles, policies and processes that the BSACI follow when developing these guidelines can be found in the BSACI [Guideline Manual](#). It is usual for experts to have some commercial/industry links, and it is essential to have the appropriate expertise when formulating guidelines. However, the validity of BSACI guidelines relies on reasonable steps being taken to ensure their integrity and independence of commercial interests.

The BSACI does not and will never accept external funding to produce any of its clinical guidance.

Members applying to join BSACI committees are required to complete a Declaration of Interest (DOI) form with their application, declaring any potential competing interests within the past three years as well as any upcoming involvement. DOI forms must be updated annually. Terms of reference for each committee and how Chairs and members are appointed can be found on the BSACI website. DOI forms are reviewed according to each committee's Terms of Reference and are available to all BSACI members and the public on request to ensure openness and transparency.

Before each meeting Chairs will review all DOI forms relating to the members and highlight any perceived or potential competing interests in relation to the proceedings of the meeting (which will be minuted in full). Where a potential competing interest is identified, it will be the decision of the chair/lead and committee to decide whether (i) the individual should leave the room (and thus provide no input) whilst the topic for which there is a competing interest is discussed; or (ii) remain in the room and be asked for comment at the end of the discussions between other members, or (iii) remain in the room but not contribute to the discussions and decision-making process in any way.

### **8.5 Speakers at BSACI events**

All speakers, facilitators, trainers and presenters taking part in a BSACI event are required to declare any competing interests (otherwise known as conflicts of interest) that they might have relating to their presentations.

A Declaration of Interest (DOI) form must be completed online by anyone presenting at any BSACI event, to report any potential competing interests relating to the previous 36 months. All declarations must be submitted at least 1 month before the event. Declaring a conflict of interest does not preclude the individual from presenting on a specific topic: it does not imply that an individual has actually been influenced. It is intended to make financial interests more transparent and allow attendees to decide for themselves the potential for the presenter having been thus influenced.

Speakers will not be able to present at BSACI events unless they have completed the online DOI form before their presentation. For the purposes of the declaration, presentations include primary care workshops, training days for trainees, webinars and the BSACI Annual Meeting as well as other events that take place where individuals are invited to present. DOI statements will be made available on the BSACI website prior to the event and will remain available on the meeting website for 1 year. Presenters will be also required to declare their interests which should be presented on a slide at the beginning of their talks.

## **9. IMPLICATIONS FOR PATIENTS**

Patients entrust healthcare professionals to deliver high quality care that is free from undue influence.

9.1 To deliver high quality and innovative care organisations need to work collaboratively with each other, with industry and other public, private and voluntary bodies and charities. Partnership working brings many benefits, but also creates the risk of conflicts of interest as detailed above.

9.2 The BSACI and its representatives want to manage these risks in the correct way. By implementing this guidance will reassure patients and the public and enable greater consistency across the activities of the BSACI to minimise any conflict of interest.

9.3 By implementing this guidance, the BSACI and the organisations with whom we work will understand the steps needed to deliver the best care and protect themselves from allegations that they have acted inappropriately.

## **10. BREACHES**

There may be situations when interests will not be identified, declared, or managed effectively. This may be inadvertent (e.g. due to poor administrative oversight) or intentional. For the purposes of this policy document, these situations are referred to as breaches.

10.1 If a breach or potential breach is identified it should be notified to the chair of the affected committee or meeting, as well as the Honorary Secretary and Chief Executive.

10.2 If the breach or potential breach is identified, the Society will take this forward as outlined in its Resolving Complaints in Relation to Work of BSACI Committees which can be found here.

10.3 If the breach has been committed by a member of staff, the process for this will be in line with BSACI disciplinary process.

## **11. SANCTIONS**

This concerns the conduct of BSACI members, staff and those serving on a BSACI Committee or in a BSACI capacity.

11.1 If any of the above are found to be in breach of the requirements contained herein, and following investigation as outlined in the document Resolving Complaints in relation to work of BSACI Committees the individual concerned will be required to stand down immediately. The DOI form requires the following confirmation:-

**“I declare that I have read and understood the BSACI Industry Interaction Policy and will comply with this and the confidentiality agreement on the DOIs form. I am aware that failure to declare relevant interests may result in me being required to stand down from the committee/group concerned”**

11.2 If breaches of national legislation or external codes of conduct take place, in relation to research activities or NHS Codes on Conflicts of Interest, it is anticipated that the employers of the individual concerned will act in accordance with sanctions outlined in the national legislation.

This policy has been informed by The British Thoracic Society (BTS) and Biomedical Industries Policy: Joint working and Funding Relationships.



## References

1. BTS and Biomedical Industries Policy: Joint Working and Funding Relationships 2019  
<https://www.brit-thoracic.org.uk/about-us/governance-documents-and-policies/>
2. Royal College of Paediatrics and Child Health: Acceptance and Refusal of Donations Policy  
[https://www.rcpch.ac.uk/sites/default/files/2019-12/acceptance\\_and\\_refusal\\_of\\_donations\\_policy\\_v2\\_2019-12.pdf.pdf](https://www.rcpch.ac.uk/sites/default/files/2019-12/acceptance_and_refusal_of_donations_policy_v2_2019-12.pdf.pdf)
3. Innovating for Health: Patients, Physicians, the pharmaceutical Industry and the NHS.  
<https://shop.rcplondon.ac.uk/products/innovating-for-health-patients-physicians-the-pharmaceutical-industry-and-the-nhs?variant=6594782021>
4. Moving Beyond Sponsorship: Joint Working between the NHS and Pharmaceutical Industry  
<https://www.networks.nhs.uk/nhs-networks/joint-working-nhs-pharmaceutical/documents/joint%20working%20toolkit%20dh.abpi.pdf>
5. BSACI – A code of Practice for Declaring and Dealing with Conflicts of Interest  
[https://bsaci.worldsecuresystems.com/BSACI%20Final%20Conflicts%20of%20Interest%20Policy%20\(2020\).pdf](https://bsaci.worldsecuresystems.com/BSACI%20Final%20Conflicts%20of%20Interest%20Policy%20(2020).pdf)
6. BSACI Guideline Manual  
<https://www.bsaci.org/Guidelines/bsaci-guidelines-and-SOCC>