# BSACCI Improving Allergy Care through education, training and research

# **BSACI INDUSTRY POLICY**

#### 1. INTRODUCTION

- 1.1 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.
- 1.2 The BSACI and industry have agendas which overlap with respect to improving patient outcomes through high quality treatments and management.
- 1.3 Building a culture of trust with industry as set out in the IFPMA ethos, whilst remaining independent will enable the BSACI to identify opportunities which benefit patient care, through shared objectives.
- 1.4 The relationship between industry and healthcare professionals is increasingly scrutinised. In order to reduce unconscious bias and mitigate against conflicts of interest that can arise, guidance as to how healthcare professionals conduct themselves when working with industry is described in the IFPMA Code of Practice Upholding Ethical Standards and Sustaining Trust.
- 1.5 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.
- 1.6 This policy will be reviewed by BSACI Trustees and BSACI elected Council members annually. Any significant changes will then be put forward to the AGM for approval.

# 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 Conference (both with respect to sponsorship and speakers), education programmes, guideline development, grants (restricted and non-restricted) and BSACI Standing Committees, SIGs, Working Groups etc... 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 Executive Team, members/individuals acting on behalf on the BSACI (external agencies contracted by the BSACI) when working with industry: including, but not limited to, pharmaceuticals, and food manufacturers, as well as 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 infant 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 the promotion of breastfeeding. For infants with a milk allergy who are unable to breastfeed, specialist milk formulas can be crucial in maintaining their health. The 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 funding from companies that promote and directly manufacture formula milk. 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 around their milk formulas.

The BSACI may elect to work with subsidiaries of companies that own manufacturers of infant milk formulas, but who are not directly involved with the production or marketing of infant milk formulas, in relation to non infant milk formulas. Where a parent company has acquired a milk formula manufacturer as part of their product portfolio the BSACI will work with the parent company in relation to other products, except milk formula. All relationships should be consistent with the BSACI Industry policy (this document) and governed by the relevant Industry codes e.g., the Association of the British Pharmaceutical Industry (ABPI) code of practice and or FPMA Code of Practice.

Individual BSACI members, may continue to make personal decisions around whether they accept funding from formula milk companies. The Society expects this to be declared where appropriate.

- 2.4 This document covers the following areas;
  - BSACI Values and general principles
  - Industry support

- Education Programmes including the BSACI Annual Conference; local and national meetings (both face-to-face and virtual); training days for trainees, webinars, workshops etc.,.
- Transparency: both with respect to the organisation, but also the senior leadership team (Board of Trustees,) CEA, Editor, BSACI Executive Team, Standing Committees, Special Interest Groups (SIGs) and Working Groups, and invited Speakers
- Breaches and potential sanctions
- Implications for patients
- 2.5 All members of the BSACI Council, Standing Committees, SIGs, Working Groups, representatives and the BSACI Executive Team are required to declare commercial and other relevant interests each year, by completing the online BSACI Declarations of Interest form(DOI) and by following the principles set out in the BSACI Conflicts of Interest (COI) Policy, which can be found <a href="https://example.com/hemes-new-months/per-new-months/example.com/hemes-new-months/example.com/hem
- 2.6 The BSACI does not invest or accept income from companies directly involved in:
  - the manufacture of tobacco
  - pornography
  - the production and distribution 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 will always negotiate with more than one company to sponsor BSACI activities and therefore will endeavour to have more than a single company funding each activity.

# COMMERCIAL SUPPORT FOR THE BSACI ANNUAL CONFERENCE MEETING

The BSACI Annual Conference 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 Conference from companies whose aims align with the BSACI. For a list of our industry partners and in what capacity they work with the society click here.

# **5.2 Industry Exhibitors**

It is important for healthcare professionals to be able to access the information they need by interacting with companies whose innovations prolong and save lives. In doing so, companies provide the healthcare community with the latest scientific and educational information to improve the understanding of treatment options available to patients.

Industry exhibitors will be situated in the designated industry exhibition area, and while exhibitors will have access to sessions during the Annual Meeting, this will be as observers only. They will not be able to contribute to session discussions. Company representatives are expected to adhere to the principles of the <u>Association of the British Pharmaceutical Industry (ABPI)</u> 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 Conference. The benefits of allowing industry a platform for sharing data is that it gives healthcare professionals access to information around treatments and ask questions and share opinions.

This enables delegates to learn more about the products and medicines that may benefit patients, as well as subsidise the cost of the Annual Conference. 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 the 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 must meet the requirements of the <u>ABPI Code</u> and will be restricted to the exhibition area. Materials can only be 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 conference 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 funding to attend its Annual Conference or other events, although the Society does expect this to be openly declared and should meet the requirements of the ABPI Code of Practice 2021 clauses 10.1,10.10 and 10.11.

# 5. EDUCATIONAL PROGRAMMES

Notwithstanding the restrictions against direct funding by formula milk companies (see 2.3), sponsorship of the BSACI's educational programmes from non-formula milk companies (for example, regional primary care training days, webinars, local one-day meetings/workshops - both virtual and in person, trainee education days) is acceptable. Sponsorship enables the BSACI to fulfil its aims and objectives in the delivery of high-quality education and training as well as opportunities to widen our reach to relevant healthcare professionals.

Educational events may be co-badged with sponsors, but only where this is being provided by more than one company. Company stands are acceptable, but must be in a separate area from where the educational content is being 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. Details of companies who are providing sponsorship must be conveyed on promotional material, to enable potential delegates to make an informed decision as to whether to take part in the event or not.

# 6. EDUCATIONAL CONTENT and DEVELOPMENT (including BSACI Annual Conference)

# **7.1 Programme Development Committees**

The public has 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 an online 'Declarations of Interest' (DOI) form. At the discretion of its Chair, BSACI Standing Committee/SIG/Working Group members with a potential conflict of interest, can still be involved in the development process (having declared their interest online). DOI must be a standing item on the agenda. Members should be asked to declare (at the start of the meeting) any potential conflict in relation to what is being covered on the agenda. Declarations of Interest can be accessed online <a href="here">here</a>. A copy of the BSACI 'Conflicts of Interest' policy can be found <a href="here">here</a>.

## 7. TRANSPARENCY

All contractual agreements with industry should be undertaken with transparency and professionalism. The BSACI actively seeks funding to support its activities . Pharmaceutical companies working with BSACI and funding activities must follow the ABPI Code of Practice. 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 'Partnership Working' section on the website <u>here</u> 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 interests exist and might be important (such as professional rivalry between two research teams working on the same topic).

# 8.3 Working in a personal capacity

BSACI does not place restrictions on its Trustees or any of its BSACI Standing Committees, SIGs, Working Groups or representatives when working with industry on a personal level. However, it must be made absolutely clear to the company what capacity you are working in i.e., a personal capacity and not as a representative of the BSACI. NB: This also applies when communicating to the media.

# 8.4 Transparency in relation to those who serve on the 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 <u>Guideline Manual</u>.

It is not unusual for experts working on guidelines to have some industry links. However, the validity of BSACI guidelines relies on reasonable steps being taken to ensure their integrity and independence of commercial interests. Therefore, members applying to join BSACI Standing Committees/SIGs/Working Groups are required to complete the online 'Declaration of Interest (DOI) form' with their application, declaring any potential competing interests within the past three years as well as any upcoming involvement. These forms must be updated annually. Terms of reference for each Standing Committees/SIGs/Working Group and how Chairs and members are appointed can be found on the BSACI website.

Where a potential competing interest is identified, it will be the decision of the chair/lead and Standing Committees/SIGs/Working Group 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.

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

## 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 and other interests more transparent and allow attendees to decide for themselves the potential for the presenter having been thus influenced. A copy of the BSACI's Conflicts of Interest Policy can be found <a href="here">here</a>.

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 Conference 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. Presenters will also be required to declare their interests which should be presented on a slide at the beginning of their talks.

## 8. 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 directly. Alternatively, details can be sent to <a href="mailto:info@bsaci.org">info@bsaci.org</a> and marked for the attention of the Chief Executive Officer.

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 Standing Committees, SIGs, or Working Groups which can be found <a href="https://example.com/here">here</a>.

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

# 9. SANCTIONS

This concerns the conduct of BSACI members, employees and those serving on BSACI Standing Committees, SIGs, Working Groups or in a BSACI capacity.

11.1 If any of the above is 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 Standing Committees, SIGs, or Working Groups 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 DOI form. I am aware that failure to declare relevant interests may result in me being required to stand down from the committee/SIG/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 <a href="https://www.rcpch.ac.uk/sites/default/files/2019-12/acceptance">https://www.rcpch.ac.uk/sites/default/files/2019-12/acceptance</a> and refusal of donations policy v2 2019-12.pdf.pdf
- 3. Innovating for Health: Patients, Physicians, the pharmaceutical Industry and the NHS <a href="https://shop.rcplondon.ac.uk/products/innovating-for-health-patients-physicians-the-pharmaceutical-industry-and-the-nhs?variant=6594782021">https://shop.rcplondon.ac.uk/products/innovating-for-health-patients-physicians-the-pharmaceutical-industry-and-the-nhs?variant=6594782021</a>
- 4. Moving Beyond Sponsorship: Joint Working between the NHS and Pharmaceutical Industry <a href="https://www.networks.nhs.uk/nhs-networks/joint-working-nhs-pharmaceutical/documents/joint%20working%20toolkit%20dh.abpi.pdf">https://www.networks.nhs.uk/nhs-networks/joint-working-nhs-pharmaceutical/documents/joint%20working%20toolkit%20dh.abpi.pdf</a>
- 5. BSACI A code of Practice for Declaring and Dealing with Conflicts of Interest <a href="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</a>
- 6. BSACI Guideline Manual

https://www.bsaci.org/Guidelines/bsaci-guidelines-and-SOCC

7. IFPMA Code of Practice

https://www.ifpma.org/publications/ifpma-code-of-practice-2019/

8. ABPI Code of Practice <a href="https://www.pmcpa.org.uk/media/3406/2021-abpi-code-of-practice.pdf">https://www.pmcpa.org.uk/media/3406/2021-abpi-code-of-practice.pdf</a>