



## Policy on declaring and managing interests

### 1. Introduction

1.1 The International Society for Gastrointestinal Hereditary Tumours (InSiGHT) aims to achieve and maintain high standards of probity in the way we conduct our business. These standards include impartiality, objectivity and integrity, and the effective stewardship of charitable funds. Managing potential conflicts of interest. Effectively managing interests is an important part of this.

### 2. Purpose

2.1 This policy supports a culture in which we are open and transparent about the interests of council and secretariat members, so that the effect of interests is known, understood and managed.

2.2 The policy provides guidance on:

- what interests need to be declared and when
- how declared interests should be recorded
- when a declared interest could represent a conflict of interest and the action that should be taken to manage this

2.3 This policy should be considered alongside other InSiGHT policies, including:

- Ethics policy
- Disciplinary policy

### 3. Scope

3.1 This policy applies to members of InSiGHT council and secretariat.

### 4. Defining and categorising interests

4.1 Council members bring a range of experiences and perspectives to InSiGHT's work. It is likely they will have a variety of interests, arising from different contexts and activities in a professional or personal capacity. This can include other sources of income, speaking engagements, shareholdings, and membership of professional or voluntary organisations.

4.2 Interests that are not, or could not be perceived to be, relevant to InSiGHT's work need not be declared. Examples of interests unrelated to InSiGHT's work could include: membership of sports and recreation societies, positions in local community groups, and shareholdings in companies unrelated to InSiGHT's work.

4.3 For the avoidance of doubt, a person living with a disease or condition relevant to InSiGHT, or who has a family member with that condition, is not seen as an interest and this does not need to be declared.

4.4 It is important to exercise judgement, and if there is any doubt as to whether an interest is relevant to InSiGHT's work, it should be declared. This includes indirect interests (see definition below), such as those relating to family and close friends, when they are known. In the case of uncertainty, all interests should be declared if, in the view of a reasonable person, they are relevant, or could be perceived to be relevant, to InSiGHT's work.

4.5 The following categories describe the types of interests relevant to InSiGHT's work. In each case, a benefit may be a gain or avoidance of a loss.

#### 4.5.1 Direct interests

A direct interest is where there is, or could be perceived to be, an opportunity for a council member to benefit. This benefit could be financial (a financial interest) or non-financial (a non-financial personal or professional interest). These are explained further below.

4.5.1.1 Financial interests: when a person gets direct financial benefit. This means anything of monetary value including: payments for services; equity interests, such as stocks, stock options or other ownership interests; and intellectual property rights, including patents and copyrights and royalties arising from such interests. Examples of financial interests are:

- work in the commercial sector, including a directorship, employment, or consultancy, that attracts regular or occasional payments or benefits in kind such as hospitality. This includes clinicians undertaking private practice
- ownership or part ownership of a healthcare provider
- shareholdings in the commercial sector
- funds that include investments in the commercial sector that are held in a portfolio where the person has the ability to instruct the fund manager as to the composition of the fund
- ownership or part-ownership of private companies, businesses or consultancies likely or possibly seeking to do business with the health or social care sector
- directorships (paid and unpaid), including non-executive positions

4.5.1.2 Non-financial professional and personal interests: where a person has another role relevant to InSiGHT's work from which they do not receive a financial benefit. This can include situations where the person:

- holds office or a position of authority in a professional organisation such as a Royal College, a university, charity, advocacy group or any other organisation in the health, public health or care sector
- holds a position of authority in an organisation contracting for services with InSiGHT

#### 4.5.2 Indirect interests

An indirect interest is where there is, or could be perceived to be, an opportunity for a third party closely associated with the council member in question to benefit. This could be through a close association with another individual or organisation who could stand to benefit from the council member's role in InSiGHT. This could include any of the following groups:

- close family members and relatives
- close friends and associates
- business partners.

### 5. Declaring interests

5.1 When there are no interests to declare, a 'nil return' should be made.

5.2 A declaration of interests should be made:

- before standing for election to InSiGHT council
- when circumstances change and new interests arise
- annually

5.3 The declaration of interests form is available in appendix A. Appendix B summarises the process for declaring interests.



## **6. Identifying and responding to potential conflicts of interest**

6.1 Declared interests will be reviewed by the Chair (or immediate past Chair) who will consider the required response. The response to a declared interest depends on the individual's role and the extent there is a risk of a conflict of interest. There is a conflict of interest when a reasonable person would consider that an individual's ability to apply judgement or act in the work of InSiGHT is, or could be perceived to be, impaired or influenced by one of their interests.

6.2 If an interest is declared but there is no risk of a conflict arising then no further action is required. However, if a declared interest represents a potential conflict of interest then action must be taken to manage this risk, exercising judgement on the proportionate approach in each case.

6.3 For prospective council members, the declared interests must be reviewed prior to formally confirming appointment. The offer of the proposed appointment may need to be withdrawn if the conflict of interest cannot be resolved.

6.4 Particular caution is also required around financial interests of a council member's close family member or associate that could be seen as giving rise to a conflict of interest (as defined above). This could include for example, when a close family member or associate could benefit financially from the person's work at InSiGHT. The action required will depend on the closeness of the relationship, and the extent the council member's actions could lead the person to benefit.

## **7. Council meetings**

7.1 Council makes strategic decisions, therefore conflicts of interest must be identified and managed.

7.2 At each meeting a copy of all declared interests of council members is made available. The Chair asks whether there are any new interests to be added or any potential conflicts of interest specific to the issues being considered at the meeting. This is to confirm, and to potentially add to, the interests that have already been identified before the meeting.

7.3 If a member has an actual or potential conflict of interest the Chair should consider the following approaches and ensure that the reason for the chosen action is documented in minutes or records:

- requiring the member to not attend the meeting and potentially excluding the member from receiving meeting papers relating to their interest
- excluding the member from all or part of the relevant discussion and decision
- noting the nature and extent of the potential conflict of interest, but judging it appropriate to allow the member to remain and participate

## **8. Records and publication**

8.1 All declared interests that are relevant or could be perceived to be relevant to InSiGHT's work will be entered onto the register of interests.

8.2 The register of interests for council members and members of the secretariat will be published on the InSiGHT website. InSiGHT will retain a record of previously declared interests for 2 years.

8.3 If people have substantial grounds for believing that publishing their interests should not take place, they should contact the Chair (or immediate past Chair) to explain why. In exceptional circumstances, for instance where publication of information might put an individual at risk of harm, information may be withheld or redacted. However, this



would be the exception and information will not be withheld or redacted merely because of a personal preference.

## **9. Dealing with breaches**

9.1 There will be situations when interests will not be identified, declared or managed appropriately and effectively. This may happen innocently, accidentally, or because of deliberate actions. For the purposes of this policy these situations are referred to as 'breaches'.

### 9.2 Identifying and reporting breaches

9.2.1 To ensure that interests are effectively managed, all those participating in our activities are encouraged to speak up about actual or suspected breaches.

9.2.2 Anyone who is aware of actual breaches of this policy, or who is concerned that there has been, or may be, a breach, should report these concerns to the Chair (or immediate past Chair).

9.3 InSiGHT investigates each reported breach according to its specific facts, and gives relevant parties the opportunity to explain and clarify the circumstances.

### 9.4 Following investigation InSiGHT:

- decides if there has been, or is potential for, an actual breach and if so, the materiality of the breach
- assesses whether further action is required, including potential disciplinary action if there has been a deliberate breach. Where an investigation concludes that formal action is required, InSiGHT's disciplinary policy and procedure will be followed.
- considers who should be made aware of the breach
- reviews and clarifies this policy, if necessary

### 9.5 Learning and transparency

9.5.1 Reports on breaches, the impact of these, and action taken is considered by council at least annually.

9.5.2 To ensure that lessons are learnt and management of interests continually improves, anonymised information on breaches, the effect of these, and action taken is published on the InSiGHT website.

Date of Council approval 9 May 2023

Date for review 8 May 2026



## Appendix A

### DECLARATIONS OF INTEREST FORM

Name: \_\_\_\_\_

Role: \_\_\_\_\_

Date appointed: \_\_\_\_\_

I have no relevant interests to declare / I declare the following interest(s)  
(Please delete)

Description of Interest

Relevant Dates:

Interest arose

Interest ceased

(Please copy the above for additional interests)

I do / do not [delete as applicable] give my consent for this information to be published on the InSiGHT website. If consent is NOT given, please give reasons: (please note this will be agreed in exceptional cases only).

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Information may be disclosed to third parties in accordance with the Freedom of Information Act 2000 and will be held by InSiGHT and published on the InSiGHT website.

I confirm that the information provided above is complete and correct. I acknowledge that any changes in these declarations during the course of my work with InSiGHT, must be notified to InSiGHT as soon as is practicable and no later than 28 days after the interest arises. I am aware that if I do not make full, accurate and timely declarations then I may be asked to stand down from council.

Chair's comments:

The following actions are required:

1. ....
2. ....

No action required

Name: \_\_\_\_\_ Date: \_\_\_\_\_



## GUIDANCE NOTES FOR COMPLETION OF DECLARATIONS OF INTEREST FORM

### Description of Interest:

Provide a description of the interest that is being declared. This should contain enough information to be meaningful to enable a reasonable person with no prior knowledge to be able to read and understand the nature of the interest.

### Types of interest:

- Financial interests - where a person gets direct financial benefit. This includes:
  - Direct ownership of shares or direct financial interest in healthcare, media, education companies or in companies related to (suppliers), or in competition with InSiGHT and its mission
  - Direct personal payment from healthcare industry: speaker fees, honoraria, consultancy, advisory board fees, investigator, committee member, etc
  - Payment from healthcare industry to your department or institution or any other legal body for your personal services: speaker fees, honoraria, consultancy, advisory board fees, investigator, committee member, etc
  - Travel and meeting support from healthcare industry, independent of the above activities
  - Receipt of royalties for intellectual property
  - Research funding from healthcare industry under your direct/personal responsibility (personal or. to department/institution).
- Non-financial professional and personal interests - Where a person has another role relevant to InSiGHT's work from which they do not receive a financial benefit. This includes:
  - holding office or a position of authority in a professional organisation such as a Royal College, a university, charity, advocacy group or any other organisation in the health, public health or care sector
  - holding a position of authority in an organisation contracting for services with InSiGHT
- Indirect interests - where there is, or could be perceived to be, an opportunity for a third party closely associated with the council member (close family members, close friends and associates and business partners) to benefit.

A benefit may arise from both a gain or avoidance of a loss.

Detail here when the interest arose and, if relevant, when it ceased.

Declared interests will be reviewed by the Chair who will consider the required response. Where the interests are relevant, or could be perceived to be relevant to InSiGHT's work, the declaration and the proposed response should be recorded.



## **Appendix B**

### **Process for declaring interests: council members and secretariat**

- Declaration of interest submitted prior to standing for election to InSiGHT Council
- Reviewed by Chair and interests added to the register of interests on appointment
- Declared interests available to Council members at every meeting
- At the start of the meeting, attendees asked to declare any changes to the declared interests and any potential conflicts of interest in relation to the items to be discussed
- Details of the interest are recorded in the Council meeting minutes including whether the member took part in the proceedings. Register of interests updated
- Annual renewal of declarations  
Secretariat prompt all council and secretariat members to complete their annual renewal or make a nil return and update the register as appropriate

