

Policy on declaring and managing interests for NICE advisory committees

Also includes witnesses, expert commentators and other contributors

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Introduction

1. NICE aims to achieve and maintain high standards of probity in the way we conduct our business. These standards include impartiality, objectivity, integrity, and the effective stewardship of public funds. Managing potential conflicts of interest is an important part of this process.
2. Effectively managing interests – and identifying potential conflicts – is essential if health and care professionals, and the public, are to maintain confidence in our work. It is central to how we develop guidance, and appoint members to our advisory committees¹.
3. This policy supports a culture in which we are open and transparent about the interests of those who are members of, or work with, our advisory committees, so that the effect of interests is known, understood and managed.
4. 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.

Scope

5. This policy applies to everyone involved in our advisory committee discussions, including the following groups:
 - advisory committee chairs
 - advisory committee members, including co-opted and topic-specific members or experts
 - those invited to give evidence or advice to advisory committee meetings, including expert witnesses
 - technology appraisal and highly specialised technologies appeal panel chairs and members.
6. The principles in this policy also apply to other NICE contributors to products that do not use a formal committee process, for example, peer reviewers who provide a published commentary.

¹ See also the [NICE recruitment and selection to advisory bodies policy](#).

7. A separate policy applies to:
- Board members and employees of NICE
 - agency workers and contractors on temporary contracts
 - secondees (people seconded to NICE from other organisations)
 - employees of the external guidance centres and the ‘evidence contractors’ working directly or indirectly to supply evidence that is used by the advisory committees.

Defining and categorising interests

8. Committee members and advisers bring a range of experiences and perspectives to NICE’s work. It is likely they will have a variety of interests, arising from different contexts and activities done in a professional or personal capacity. This can include employment and other sources of income, speaking engagements, shareholdings, publications and research, and membership of professional or voluntary organisations.
9. Having advisory committee members with 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.

All interests should be declared if, in the view of a reasonable person, they are relevant, or could be perceived to be relevant, to the work of the NICE committee in question.

10. Interests that are not, or could not be perceived to be, relevant to the NICE committee’s work need not be declared. This could include, for example, membership of sports and recreation societies, positions in local community groups, and shareholdings in companies unrelated to NICE’s work.
11. For the avoidance of doubt, a person living with a disease or condition relevant to the matter under discussion, or who has a family member in that position, is not seen as an interest and this does not need to be declared.
12. It is important to exercise judgement, and if there is any doubt as to whether an interest is relevant to the committee’s work, it should be declared. This includes indirect interests, such as those relating to family and friends, when they are known. In the case of particular uncertainty,

further advice is available from the NICE team or external developer. When there are no interests to declare, a 'nil return' should be made.

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

Direct interests

14. A direct interest is when there is, or could be perceived to be, an opportunity for a person involved with NICE's work 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.
15. ***Financial interests:*** When a person gets direct financial benefit. This 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. Examples of financial interests are:

- Work in the commercial sector², 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, including a GP who is a partner in a practice or a community pharmacist who owns their business.
- Direct payment from the commercial sector to attend a meeting, conference or event, over and above funding to support reasonable travel, accommodation and attendance costs.³
- 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.
- Personal payment to undertake sponsored research.

² The term 'commercial sector' refers to businesses and trade associations. Those particularly relevant to NICE include private health and social care providers, companies involved in products that might affect the public's health such as food, alcohol and tobacco industries, and companies with an interest in products, technologies and services that apply to the health and care sector.

³ In the case of any doubt over 'reasonable' see the NICE travel and subsistence policy.

16. ***Non-financial professional and personal interests:*** When a person has a non-financial professional or personal benefit, such as increasing or maintaining their professional reputation. This can include situations where the person:
- Is an advocate for a particular group or is a member of a lobbying or pressure group with an interest in health or social care.
 - Holds office or a position of authority in a professional organisation such as a royal college, a university, charity, or advocacy group.
 - Is actively involved in an ongoing or scheduled trial or research project aimed at determining the effectiveness of a matter under review.
 - Has published a clear opinion about the matter under consideration.
 - Has authored or co-authored a document submitted as an evidence publication to the relevant NICE advisory committee.

Indirect interests

17. An indirect interest is when there is, or could be perceived to be, an opportunity for a third party closely associated with the person in question to benefit. This could be through a close association with another person or organisation that has a financial or non-financial interest (as defined above), and could benefit from a decision the person is involved in making through their work on an advisory committee.
18. Indirect interests can arise from people (such as close relatives, close friends and associates and business partners), and also employers (for example with research grants or other funding to the unit in which they work).

Declaring interests

19. Committee chairs and members make their first declaration when applying for a specific advisory committee role. Witnesses and other contributors make their first declaration when invited to contribute to a committee meeting. The **initial declaration** covers the preceding 12-month period. Consideration should also be given to any new interests that are not currently held but will arise during involvement with the committee (for example a new research project).
20. People will be prompted to **update** their declaration:
- before each meeting, by email
 - at the start of each meeting, orally
 - each year (standing committees), by email.

21. Any new information provided before or during meetings, or at the annual update, is added to the original declaration, to give a full picture of the 12 months before beginning work with NICE.
22. It is the person's responsibility to identify and declare interests at the earliest opportunity, and to ensure this declaration remains up-to-date.
23. The declaration of interests form is available in [appendix A](#). A summary of the process for declaring interests is set out in [appendix B](#).

Identifying and responding to potential conflicts of interest

24. The response to declared interests depends on a person's role within the advisory committee (for example, chair, member, adviser, witness) and what is being considered by the committee.
25. Each case is different and the circumstances must be clarified with the people involved to assess the perceived risk of a conflict of interest. When the interest is specific to the topic under discussion, there is greater likelihood of a conflict of interest (see below). Good judgement is needed to ensure proportionate management of risk.

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 NICE is, or could be perceived to be, impaired or influenced by one of their interests.

Responses to declared interests

26. There are 3 potential responses following a declaration of interest:
 - **No action other than the process of open declaration** – the person can engage in all aspects of the committee's work. This is usually because nothing is considered to represent a perceived conflict of interest, but may in some circumstances be because an open declaration is considered sufficient to mitigate any risk of conflict. Open declaration will usually be sufficient if a financial interest occurred in the last 12 months and is no longer held. For example, if a person has ceased to hold shares or undertake relevant private practice. This is because the potential to benefit has ceased.

- **Partial exclusion** – the person can engage in committee discussion or provide advice to the meeting (for example, because of their expert knowledge), but is excluded from developing recommendations and decision-making on the matter relating to the interest. Involvement may be limited to answering direct questions from the committee.
- **Complete exclusion** – the person can have no input to a specific topic, either from the start (non-appointment) or for part of the committee’s work relating to that topic. When an interest leads to exclusion for a specific topic, it may be appropriate to withhold any confidential meeting papers for that item especially when the person could benefit from the information.

Interests at appointment

27. Assessment of an applicant’s declared interests and curriculum vitae is done by a senior member of the NICE guidance programme (or external contractor), who agrees a final declaration with each applicant. The appointment panel considers whether any interests mean that they cannot be appointed. In the case of doubt, the relevant director considers the declared interests and, in very unusual circumstances, the decision is referred to the ‘conflict of interest reference panel’ (see [appendix C](#) for terms of reference).
28. Examples of how interests are handled during the appointment process are given in [appendix D](#).

Chairs

29. The chairs of advisory committees are in a special position in relation to the work of their committee and have greater scope to influence the outcome of discussions. The chair helps the committee to work collaboratively, ensures a balanced contribution from all committee members and takes decisions about the potential conflicts of interest of their committee members. Chairs are appointed for their expertise and skill in chairing groups, and although they may have some knowledge of the topic, this is not their primary role in the group. Specialist knowledge is provided by other committee members.
30. The interests of potential chairs need to be considered in relation to the type of committee. Topic-specific guideline committees cover a defined area, therefore it is possible (and necessary) to identify and exclude possible conflicts of interest before appointment. This means chairs of topic-specific committees cannot have any direct interests. Standing committees cover a broad range of topics, therefore potential conflicts

can generally be handled on a meeting-by-meeting basis (see box below).

Appointing chairs

Topic-specific guideline committees:

Chairs cannot have any direct interests (financial, non-financial professional or personal) that relate to the services, interventions, products, or delivery of care to be considered within the scope of the guideline.⁴

It may also be inappropriate for chairs to have relevant indirect interests, including when a close family member could potentially gain financially from the person's work with NICE.

Standing committees:

Chairs cannot have any direct financial interests that relate to the development, manufacture or marketing of products that may be considered by the committee.

Other financial interests, such as private practice, direct non-financial or indirect interests, can usually be dealt with on a case-by-case basis at the relevant meeting. If these interests cover a significant portfolio of the committee's work, non-appointment may be necessary because the chair may need to be repeatedly excluded from the committee's discussions.

Members and co-optee members (standing and topic-specific guideline committees)

31. Members and co-optees are selected to bring a range of interests and expertise to the committee's discussion. Often these interests need no more than open declaration, but they can result in partial or complete exclusion from the committee discussion when there is a conflict of interest.

Appointing members to all committees

Individual members and co-optees should not be appointed if they have specific interests that mean they are likely to be excluded from more than 50% of the committee's discussions.

⁴ This does not include GPs (partner, salaried or locum) with a general interest in the topic through the provision of primary care services

Handling interests at committee meetings following appointment (standing committees and topic-specific guideline committees)

Specific interests are those that relate to matters under consideration at a particular meeting, and these interests are where conflicts are most likely to arise. Specific interests include anything that relates to, or informs, a potential recommendation, including all:

- products and competitor products
- interventions, including public health interventions and diagnostic tests
- topic areas, such as diagnosis or investigation of clinical issues
- underpinning research papers or economic analyses.

Specific interests do not include having a general interest in the topic under discussion, such as providing social care, or pharmacy or laboratory services, or through being a salaried employee in a commercial organisation that provides these services.

Income received from consultancy or other advisory services will be treated as a specific interest when it relates to the product under consideration, or the comparator to that product. Advisory services on matters unrelated to these products is not a specific interest. This is explained further in the examples in appendix E.

Before the meeting

32. In advance of each committee meeting, the NICE guidance team (or external contractor) identifies the issues being considered at the meeting. The NICE guidance team (or external contractor) reviews the list of declared interests from the chair, members and co-optees to determine whether there are any potential conflicts of interest relating to these specific areas.
33. The NICE guidance team (or external contractor), in consultation with the chair, considers the actions needed and notifies the affected person. In the event of an unresolvable disagreement or uncertainty between the chair and a member of the advisory body, the view of the relevant NICE

programme director or authorised deputy must be sought. When uncertainty or disagreement remains, the programme director may decide to escalate the issue to the director. Following discussion with the programme director, the director will either resolve the matter or refer this to the 'conflicts of interest reference panel' for consideration (see [appendix C](#) for terms of reference).

34. The general approach to handling specific interests at meetings is listed in the table below. Whenever the interest leads to excluding the chair, the vice chair will cover that item. Specific examples are given in [appendix E](#).

Specific interests at committee meetings	Approach to handling at meetings
Direct financial interests	<p>Any member or standing committee chair with a specific financial interest leaves the meeting for the duration of the relevant item.</p> <p>In exceptional circumstances, when a member has particular expertise that would otherwise not be available to the committee, they may attend to answer specific questions, but would not usually take part in the decision-making.</p> <p>When the interest relates to private practice and income in the commercial sector, a member may be able to participate if their clinical experience is considered vital to the discussion.⁵ In such circumstances, the level of involvement (full involvement or partial exclusion) will depend on the scope for potential benefit (and risk of conflict of interest).</p>
Direct, non-financial interests (personal and professional)	<p>Any member or standing committee chair with a specific non-financial interest may need to leave the meeting for the relevant item.</p> <p>Particular care is needed around any reputational interest related to positions held in other organisations, and publications authored or public statements made, which could reasonably be interpreted as potentially prejudicial to an objective interpretation of the evidence. A decision on participation should balance this risk with the benefit of the committee's access to the person's expertise.</p> <p>Involvement in guidelines developed in accordance with international criteria does not usually lead to exclusion from the meeting.</p>
Indirect interests	<p>Any member or chair with specific indirect interests usually needs to do no more than declare this interest. However exclusion may be needed when a close family member could potentially gain from the committee's work.</p>

⁵ Consideration should be given to whether the relevant clinical experience could be accessed in other ways, for example through written submission.

Witnesses and other contributors (non-committee members)

35. Others contributing to the committee are likely to be either providing expert advice or giving a particular perspective, but will not be contributing to the final decision-making. Every effort will be made to select experts who do not have a conflict of interest that would require a member of the committee to withdraw from the discussion. However, there is discretion to invite an expert with such a conflict when the work of the committee would be seriously compromised without their testimony. For example, in an area where the number of experts is very small and there has been close collaboration between a clinical specialty and the life sciences industry in developing new technologies.
36. Those attending on behalf of an organisation should consider whether any funding to the organisation from the commercial sector represents an indirect interest that should be declared.

At the meeting

37. At each meeting, a copy of all declared interests, including those of the chair, any co-optees and additional invited experts, is made available to the committee.
38. 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.
39. If a person is aware that a product or service under consideration is, or may become, a competitor of a product or service developed, manufactured, sold or supplied by a company in which they have a current financial (either direct or indirect) interest, this should be declared.⁶
40. The chair informs the meeting attendees of the actions agreed in relation to any specific interests.

Records and publication

41. All declared interests that are relevant, or potentially relevant, to the work of the NICE committee are logged on a register of interests for that

⁶ In the technology appraisal programme, competitors are comparator products outlined in the appraisal scope. Potential competitors are products which have been referred by Ministers to NICE for appraisal.

committee. This is available on the NICE website and at the start of each committee meeting, and updated as needed.

42. For members and the committee chair, the register will include the interests from the date of appointment plus the preceding 12 months. If there is a reappointment to a standing committee, the register will include the interests from the date of reappointment plus the preceding 12 months.
43. For standing committees, the register will include the interests of those who attended the committee to give evidence or advice in the previous year. For topic-specific guideline committees, it will include the interests of those who attended the committee to give evidence or advice during guideline development.
44. A written audit trail is maintained of the information considered and any actions taken. The committee minutes record the interests declared and action taken in response. Interests are also published as part of the guidance publications.

Exceptions

45. If people have substantial grounds for believing that publishing their interests should not take place, then they should contact the Associate Director, Corporate Office to explain why. In exceptional circumstances, for instance when publishing information might put a person 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.

Wider transparency initiatives

46. In keeping with the purpose of this policy, NICE fully supports wider transparency initiatives in healthcare. For example, we strongly encourage people to give their consent for payments they receive from the pharmaceutical industry to be disclosed as part of the Association of British Pharmaceutical Industry (ABPI) Disclosure UK initiative. These 'transfers of value' include payments relating to:
 - speaking at and chairing meetings
 - training services
 - advisory board meetings
 - fees and expenses paid to healthcare professionals

- sponsorship of attendance at meetings, which includes registration fees and the costs of accommodation and travel, both inside and outside the UK
- donations, grants and benefits in kind provided to healthcare organisations.

47. Further information about the scheme can be found on the [ABPI website](#).

Dealing with breaches

48. 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'.

Identifying and reporting breaches

49. To ensure that interests are effectively managed, staff, those participating in our committees and stakeholders are encouraged to speak up about actual or suspected breaches.

50. 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 of the committee and a senior member of the NICE (or guideline developer) team.

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

52. Following investigation NICE:

- 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
- considers who should be made aware of the breach
- takes action and clarifies the policy, if necessary.

Learning and transparency

53. Reports on breaches, the effect of these, and action taken is considered by the senior management team and audit and risk committee at least annually.

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

Review

55. This policy will be reviewed every 3 years unless an earlier review is needed.

Relevant legislation, guidance and NICE policies

- The Bribery Act 2010, which includes the offences of offering or receiving a bribe
- Freedom of Information Act 2000
- ABPI: The Code of Practice for the Pharmaceutical Industry (2016)
- ABHI Code of Business Practice
- MedTech Europe Code of Ethical Business Practice (2015)
- NHS Code of Conduct and Accountability (July 2004)
- NICE Standards of Business Code of Conduct
- Recruitment and selection to advisory bodies' policy and procedure
- NICE gifts and hospitality policy
- NICE non-staff travel, subsistence and general expenses policy

Appendix A: declarations of interest form

Declarations of interest form				
Name:				
Advisory committee:				
Role:				
Type of interest	Description of interest	Relevant dates		Comments (for NICE / external contractor to complete)
		Interest arose	Interest ceased	

* Please see over the page for information on how to populate the above boxes

The information you provide on this form will be used to assess if you have any potential conflicts of interest, we ask for this information to comply with our organisational policies.

Information may be disclosed to third parties in accordance with the Freedom of Information Act 2000 and will be published in registers that NICE holds.

For more information about how we process your personal data, please see our [privacy notice](#).

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 NICE, must be notified to NICE 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 the advisory committee.

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

Signed:

Dated:

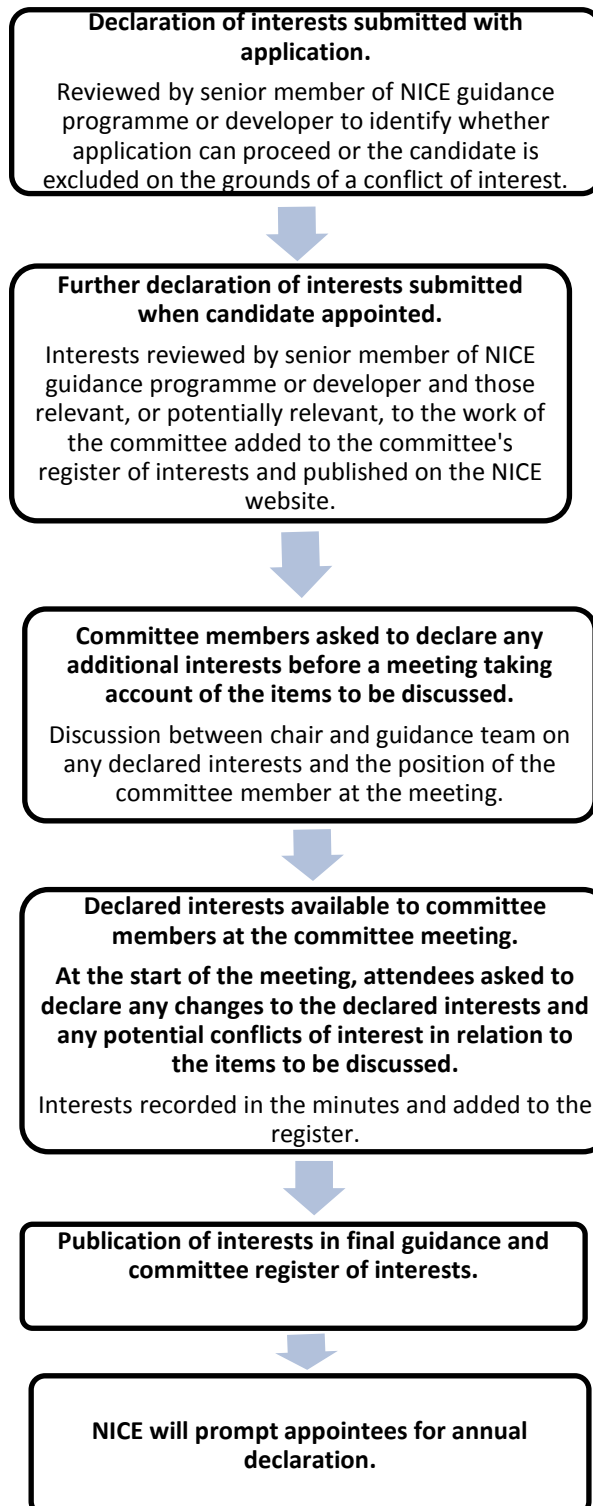
Please return this form to [insert contact details of individual/team]

* Guidance notes for completion of the Declarations of interest form

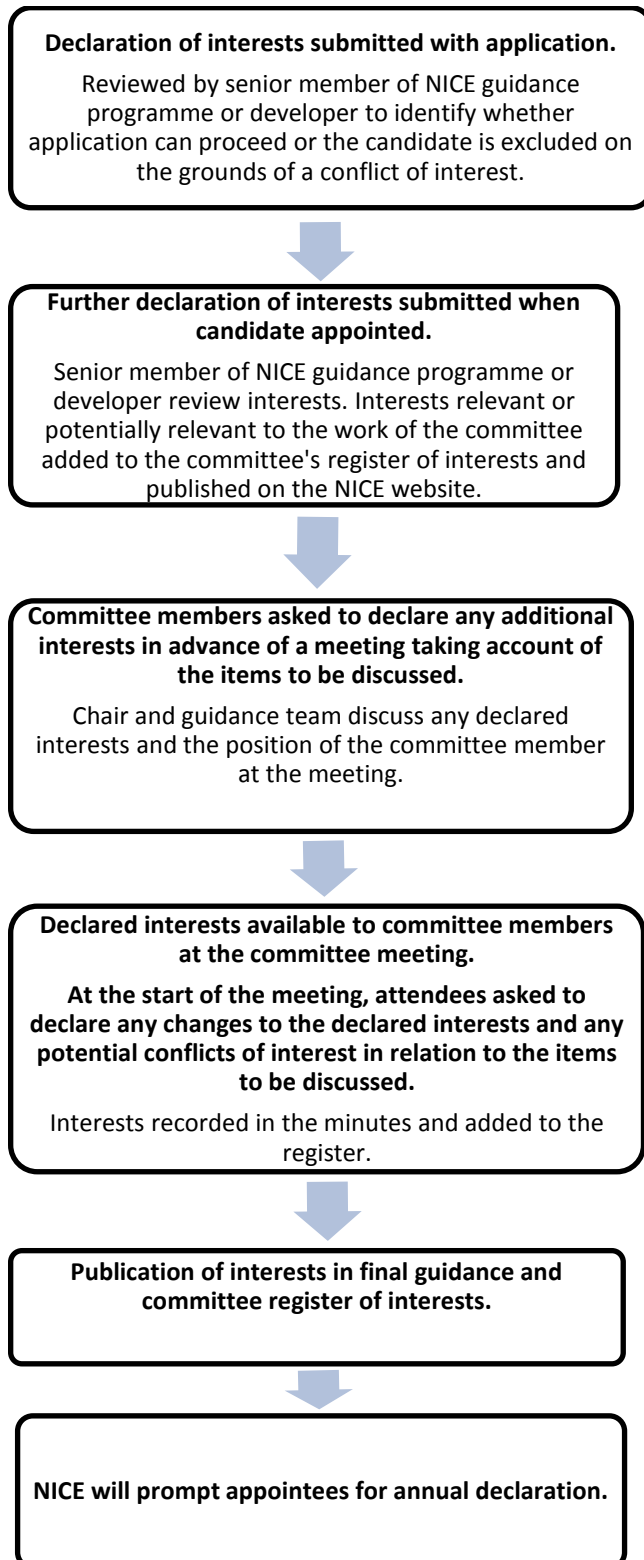
Name and role	Insert your name and your position in relation to your role within NICE
Description of interest	<p>Provide a description of the interest that is being declared. This should contain enough information to be meaningful to enable a reasonable person with no prior knowledge to be able to read this and understand the nature of the interest.</p> <p>Types of interest:</p> <p>Direct interests</p> <p>Financial interests - Where an individual gets direct financial benefits from the consequences of a decision they are involved in making. <i>For examples of financial interests please refer to the policy on declaring and managing interests.</i></p> <p>Non-financial professional and personal interests - Where an individual obtains a non-financial professional or personal benefit, such as increasing or maintaining their professional reputation, from the consequences of a decision they are involved in making. <i>For examples of non-financial interests please refer to the policy on declaring and managing interests.</i></p> <p>Indirect interests - Where there is, or could be perceived to be, an opportunity for a third party associated with the individual in question to benefit.</p> <p>A benefit may arise from both a gain or avoidance of a loss.</p>
Relevant dates	Detail here when the interest arose and, if applicable, when it ceased.
Comments	This field should be populated by the guidance developer and outline the action taken in response to the declared interest. It should include the rationale for this action, and the name and role of the person who reviewed the declaration.

Appendix B: process for declaring interests

Committee chairs and members



Witnesses and other contributors to committees (that is, non-committee members)



Appendix C: conflict of interest reference panel terms of reference

Objectives

- To provide advice to directors, with a short turnaround time, on novel and contentious matters relating to conflicts of interest.
- To help promote consistency in the handling of challenging cases.
- To review decisions made by the reference panel in the previous year on an annual basis, to consider whether any amendments to the policy on declaring and managing interests for advisory committees are needed.

Membership

- Two non-executive directors (including the audit and risk committee chair who will chair the panel) and 2 senior management team members from non-guidance producing directorates.

Ways of working

- Email with the option to meet by teleconference should this be needed. In the case of a teleconference, a quorum will be 1 non-executive director and 1 senior management team member.
- NICE's Corporate Office will retain a record of referrals to the panel, and the advice given, to inform future cases.

Appendix D: examples of handling interests at appointment

Topic-specific guideline committees: examples of non-appointable chairs

Guideline topic	Chair not appointable	Rationale
Acute heart failure	Cardiologist with specific expertise in managing heart failure, exemplified by a portfolio of research interests and publications in this area.	This represents a direct non-financial professional interest (published clear opinion on matters within the scope of the guideline).
Epilepsy in adults	Neurologist with private practice that provides specialised epilepsy procedures.	This represents a direct financial interest as the areas of work done in private practice are within the scope of the guideline.
Obesity	Academic with significant grants for research into diet and obesity from industry bodies.	This represents a direct financial interest (grants from the commercial sector) and a non-financial professional interest (published clear opinion).
Physical activity	Spouse runs a business providing lifestyle coaching and physical activity sessions.	This represents an indirect interest that could be perceived as affecting the judgement of the chair.
Home care	Board member of a charity providing home care services.	This represents a direct non-financial interest (holds office in a position of authority).
Alcohol interventions in schools	Professor of public health at an academic institution, who has research interests in school-based alcohol interventions and has expressed a clear opinion supporting a particular behavioural intervention that is being considered in the guidance.	This represents a non-financial professional interest (has published a clear opinion about the matter under consideration).

Topic-specific guideline committees: examples of appointable chairs

Guideline topic	Chair appointable	Rationale
Eating disorders in young people	Adult psychiatrist with a practice focused on anxiety and depression.	There are no direct interests in the topic under discussion.
Medicines management in care homes	Manager of a large care home, which is privately owned and mostly funded by the private sector.	There are no direct interests in the interventions covered in the guideline. The manager is salaried so there is no scope for direct personal gain from the committee's work.
Smoking cessation	Director of public health in a local authority, with no research interests or published opinions on research opinion.	There are no direct interests in the interventions under consideration (an expressed opinion that smoking is harmful is to be expected). There is no scope for direct gain from the committee's work.
Asthma: diagnosis and management	A GP (partner or salaried) who has an interest in asthma, but no recent publications in this area or scope to personally financially gain from the recommendations in the guideline.	The GP has a general interest in asthma and primary care services, but there is no scope for direct gain from the committee's work.

Standing committees: examples of non-appointable chairs

Committee	Chair not appointable	Rationale
Technology appraisal and highly specialised technologies	Hepatologist with a significant research portfolio, most of which is funded by the pharmaceutical industry, some as personal payments.	The personal payments represent direct financial interests (grants from the commercial sector) that would be perceived as a conflict, and the broad portfolio would probably mean exclusion from more than 50% of the committee's discussions.
Indicator committee	GP who has income from the Quality and Outcomes Framework.	This represents a direct financial interest because the GP's income could be affected by the decisions of the committee.

All committees: examples of non-appointable members

Committee	Member not appointable	Rationale
Technology appraisal and highly specialised technologies	Member with a broad portfolio of shares in the pharmaceutical industry.	This represents a direct financial interest and the broad portfolio covering a number of companies would probably mean exclusion from more than 50% of the committee's discussions.
Guideline on high blood pressure	Cardiologist with a broad portfolio of research funded primarily by the pharmaceutical industry.	This represents a direct financial interest and the extent of research portfolio funded by a number of companies would probably mean exclusion from more than 50% of the meetings.

Appendix E: examples of handling specific interests at meetings

Example of interests	Action and rationale
<p>Consultancy fee received by a committee member from the company producing the product under consideration, or the comparator.</p>	<p>The action depends on the nature of the consultancy undertaken.</p> <ul style="list-style-type: none"> • Complete exclusion – if this relates to the product under consideration, or the comparator, as the interest is a specific direct financial interest. • Declare and remain – if the consultancy is unrelated to the product under consideration or the comparator, as the interest is not specific. <p>If the consultancy income from the manufacturer of the product under review, or the comparator, accounts for a majority of the person's income then it may be appropriate to exclude the person from the discussion (in the way an employee of the manufacturer would be – see below example).</p>
<p>Technology appraisal committee member employed by a company that manufactures a competitor to the product under review.</p>	<p>Complete exclusion –this represents a direct financial interest. It may be appropriate to withhold from the member confidential information in the meeting papers for the topic if these contain commercially sensitive information.</p>
<p>Private practice income from the procedure, intervention or delivery of care under consideration.</p>	<p>Chairs - complete exclusion.</p> <p>Members – complete exclusion unless their clinical experience is considered vital to the discussion.⁷ In such circumstances, the level of involvement (full involvement or partial exclusion) will depend on the scope for potential gain (and risk of conflict of interest). For example, full participation may be appropriate if general medical services are provided on a salaried basis and mirror NHS activity. Whereas there is greater scope for a perceived conflict of interest when non-NHS income is directly contingent on the volume of a specific procedure.</p>
<p>Publications in which a member expresses a clear opinion about the intervention being considered.</p>	<p>Potential exclusion – this is non-financial professional interest and the response will depend on the nature of the view expressed and the risk to perceived objectivity. In determining the level of involvement the chair should consider the balance between this risk and the benefit of the member's input to the committee. It may be decided to allow a member to remain in the room to answer questions but not take part in decision-making.</p>

Grant income received by the member's employer from the company that manufactures the product.	Declare and remain – this is an indirect interest, because the income goes to the employer.
Spouse doing research in the area under discussion.	Declare and remain – this is an indirect interest with no direct financial gain.
Employee of a charity with an interest in the condition.	Declare and remain – this is a direct interest, but with no clear financial benefit to the person. However, a person may need to be excluded if they hold a senior position of authority in an organisation that has expressed a clear opinion on the issue, if this could reasonably be interpreted as affecting the objective interpretation of the evidence.
Research publications covering epidemiology of the condition.	Declare and remain –this is not an intervention that might be recommended in the guidance.
Previous member of a guideline on the same topic produced by a professional body.	Declare and remain – the guideline was produced collaboratively by consensus and was not the person's own work. The benefit of their expertise in this topic outweighs a risk of perceived bias.
Indicator Advisory Committee member who is a GP.	Declare and remain – while the GP's income could ultimately be affected, the benefit of their expertise in this topic outweighs a risk of bias.

⁷ Consideration should be given to whether the relevant clinical experience could be accessed in other ways, for example through written submission