



# THE BRITTLE BONE SOCIETY

## Conflicts of Interest Policy

Conflicts of interest are to be avoided where possible. If they cannot be avoided, they must be disclosed in accordance with this Policy. This Policy also sets out the additional steps to be taken following disclosure.

### Introduction

A conflict of interest is any situation where the outside interests of someone who is an employee, a member of the Research Committee or a member of the Executive Committee of BBS could, or could appear, to prevent that person from acting in BBS's best interests. This most often arises because of a personal or business relationship an employee or a member of the Research Committee or the Executive Committee has with someone in a business or organisation with whom BBS works or collaborates.

Conflicts of interests can arise in a variety of situations, and employees, Research Committee and Executive Committee members must be alert to any circumstances that could reasonably be expected to give rise to, or be viewed as, a conflict of interest.

### Examples

Examples where employees and Research Committee and Executive Committee members will have a conflict of interest are where the employee or the Research Committee or Executive Committee member or a family member or close friend of any of them:

- receives payment from BBS for goods or services. For employees, these will be payments outside of the employment relationship;
- makes a loan to or receives a loan from BBS;
- owns a business that enters into a contract with BBS;
- uses BBS's services;
- enters into a financial transaction with BBS or receives any financial resources from BBS (in both cases outside of an employee's normal remuneration);
- holds equity interests (if worth £10,000 or more, or more than 1% of the total issued capital) in enterprises with involvement in pharmaceuticals, healthcare, biotech or related areas, or in any other enterprise that may have a real or perceived interest in the work of the BBS. For reference, in most instances, third party investments (e.g. ISAs) will not be considered as a conflict of interest, although any concerns should be reviewed with a member of the Executive Committee;
- holds a consultancy or consultancies and other external appointments (paid and unpaid), together with details of any remuneration or other benefits arising from these;
- is an applicant or co-applicant on a grant application;
- is a, or could be seen as a, direct competitor of the applicant (e.g. they are funded or applying for funding on a similar project to the proposal under discussion) or have

collaborated or published with the proposal applicant within the past three years, or work in the same institution.

## Constitutional Prohibitions

Some type's conflicts of interest are prohibited by BBS's constitution. These include a prohibition on any member of the Executive Committee acquiring any interest in property belonging to BBS (otherwise than as a trustee for BBS) or receiving remuneration or being interested in any contract entered into by the Executive Committee. If the conflict of interest is not prohibited, it must be disclosed and recorded, and measures may be taken to prevent or limit the participation of the Executive Committee member or an employee in matters where the Executive Committee member or employee has a conflict of interest.

## Notification and Further Actions

Employees and members of the Research Committee and Executive Committee must notify any matter where they think they may have a conflict of interest to [details]. [Details] will provide you with instructions on how the conflict of interest is to be handled. In some instances, [details] will need to seek guidance from the Executive Committee before being able to provide these instructions to you.

The procedure for conflicts of interest involving Research Committee and Executive Committee members is as follows:

1. All Research Committee and Executive Committee members must disclose any potential conflict of interest as soon as they become aware of it. The conflicted Research Committee and/or Executive Committee member is to refrain from any discussions with other Research Committee/Executive Committee members concerning the conflicted matter unless authorised to do so by the Chair of the applicable Committee. In some circumstances, the Chair will ask the Research Committee and Executive Committee member to prepare a briefing paper on the matter. The briefing paper must clearly disclose the Research Committee/Executive Committee member's conflict of interest.
2. All matters involving a conflict of interest by a Research Committee or Executive Committee member must be considered at an Executive Committee meeting before BBS proceeds with the matter. No papers or reports concerning the conflicted matter may be circulated to the conflicted Research Committee/ Executive Committee member without the authority of the applicable Chair.
3. The conflict of interest must be disclosed at the beginning of the Research Committee and Executive Committee meeting at which the matter is being considered.
4. The non-conflicted Research Committee or Executive Committee members at the meeting will determine how discussions concerning the conflict matter will be handled at the meeting. In some cases, the conflicted Research Committee/ Executive Committee member will be permitted to provide information on the agenda item, although the Research Committee and Executive Committee member will not be permitted to participate in BBS's formal decision on the item. In other cases, the interested Research Committee/ Executive Committee member will be excluded from all aspects of BBS's decision, including circulation of papers and reports.

5. The Research Committee and Executive Committee members may not approve a matter involving a conflict of interest unless they are satisfied that the independence of their decision is assured.
6. In cases of significant and/or repeated conflicts of interest, the Executive Committee may remove the applicable Committee member.

### Professional Services

Where the Executive Committee member is associated with a professional firm (such as an accounting or legal firm) and that professional firm agrees to provide services to BBS on a pro bono basis, that conflict of interest relationship only needs to be approved once by the **Research Executive Committee**. It does not need to be approved in each instance where the services are being provided.

### Register

BBS maintains a register of all matters where employees and members of the Research Committee and the Executive Committee have declared a conflict of interest. This includes details of the type of conflict of interest, the employees/Committee Members affected and any directions given in connection with the conflict of interest.