

National Respiratory Audit Programme (NRAP)

Declaration of Interests Policy

Version 1: June 2023

1. Introduction

- 1.1 Members of the National Respiratory Audit Programme (NRAP) Board, advisory groups or any ad hoc NRAP groups will participate in audit programme activities and decisions and, therefore, declarations of interests that may conflict with the audit programme are required as a matter of good governance.
- 1.2 Actual or perceived conflicts of interest have the potential to lead to poor decision making, external challenge, loss of trust and confidence of stakeholders, and could adversely impact the reputation of NRAP and the Royal College of Physicians (RCP). Whilst actual conflicts of interest are rare, actual and perceived conflicts of interests cannot be avoided altogether and, therefore, it is good practice and good governance to have a formal policy, which describes how perceived and actual conflicts of interests will be managed. The policy is intended to be implemented consistently and transparently across NRAP in order to help demonstrate that all members of NRAP groups are acting in the best interest of the programme at all times.
- 1.3 This document relates specifically to appointments/membership to the NRAP Board, advisory groups and any ad hoc NRAP groups. It has been adapted from the following:
 - Declaration of Interests, RCP Policy, 2011
 - Clinical Standards Department: Declaration of Interest's Policy, RCP, 2012

2. Who this affects

- 2.1 All members of the NRAP Board, COPD advisory group and asthma advisory group, as well as any ad hoc NRAP groups (e.g. task and finish groups) which the programme may require during the contract period that contribute to discussion, both virtual and face-face, or any persons that step in for members of these groups in their absence.
- 2.2 For the purposes of this document, all members of the NRAP groups listed at 2.1 are referred to as 'NRAP Contributors'.

3. Purpose of the policy

- 3.1 The key intention of this policy is to make sure that perceived and actual conflicts of interest are identified, so that discussion of any issues can take place in the knowledge of such interests and thus take account of them.
- 3.2 The test of what constitutes a relevant interest will be whether a reasonable third party would be likely to consider that the objectivity of the person's views or conduct might be affected or influenced by that interest.

4. Operational policy

- 4.1 All NRAP Contributors will be asked to make declarations of interests which will be in written form (paper or electronic) and stored. It will be necessary to store these declarations of interest to ensure the NRAP audit team can refer to these and take into account any conflicts of interests when NRAP Contributors provide comment or advice on any audit activities.
- 4.2 This will be carried out as a structured process to establish the system, and then will be required of new appointees as they become involved in NRAP groups.
- 4.3 Such records will be collated and maintained by the NRAP Project Manager/Project Coordinators, who will process the data, for the relevant part of the programme. The record will be available to all Board members to review on request in the interests of transparency. The Healthcare Quality Improvement Partnership (HQIP) control all data collected as part of NRAP.
- 4.4 The purpose of maintaining such a record is to enable NRAP to be aware of the relevant actual or perceived interests and to provide a source of reference should that be needed.
- 4.5 Declarations of interest will be stored in password protected folders on the RCP computer system. Any declarations of interest that are received by post will be scanned and saved on the RCP computer system and the original paper copy stored in a locked cupboard.
- 4.6 NRAP Contributors can request to review and update their declarations of interests at any time.
- 4.7 Declarations of interest will be kept for five years after the end of the audit programme contract in line with the retention policy for the audit.

5. Disclosure of interests by individuals

- 5.1 In completing the declaration of interests described above, an individual should be mindful of any interests that could potentially conflict with or prejudice his or her independence and objectivity in participating in the work of NRAP.
- 5.2 Completion of this declaration will be a condition of such involvement in NRAP meetings and activities.
- 5.3 An interest is any arrangement which constitutes a current significant benefit to the individual or immediate family concerned, such as any financial benefit to the person, hospital, practice or department in which they are employed and also membership of any organisation whose interests might conflict from time to time with the RCP and NRAP. Generally, but not exclusively, the situations might include:
 - Sponsorship or payment of expenses by commercial organisations.
 - Donations, sponsorship or similar from pharmaceutical firms and equipment manufacturers.
 - Consultancies and fees paid.
 - Patents (existing or pending) held by the individual or department.
 - Holding of shares in commercial organisations (e.g. pharmaceutical/equipment manufacturers), including relevant shareholdings by family members that could have a bearing on objectivity.
 - Membership of any national body, charity or pressure group.
 - Editorial responsibility including payment for publications (written or electronic)
 - Membership of any political party or private organisation that could have a bearing on the work of NRAP and/or the RCP.
- 5.4 It will be the responsibility of each individual to maintain the accuracy and timeliness of their declaration, and to notify any changes. If a new interest arises after the declaration has been completed, he or she should as soon as possible notify NRAP in writing, giving details, via email or

post using the details provided at the bottom of the Declarations of Interest Form. NRAP may ask for further information as may reasonably be required if this seems appropriate.

- 5.5 As well as maintaining written declarations of interest, NRAP will foster a culture whereby NRAP Contributors are mindful of any interest that might be regarded as conflicting and encouraged to declare it. In doing so, we seek to achieve a balance between accountability and unnecessary intrusion into the affairs of members of NRAP groups.
- 5.6 At the start of each and every formal NRAP board, advisory or ad hoc group meeting as a matter of routine, the Chairperson will ask members to declare any interests relevant to the business on the agenda. If a member realises that there may be a conflict only when an item starts to be discussed, they should declare it at that point.
- 5.7 Once an interest has been declared, it will be for the Chairperson of the meeting to decide whether, in an exceptional circumstance that the individual should leave whilst the item is discussed; or whether discussion should continue with the member present but with all aware of the potential for conflict; or whether the member should recuse themselves from decision making; or some other course of action is more appropriate as determined by the Chairperson.

6. Disclosure of interests by the National Respiratory Audit Programme

- 6.1 NRAP is delivered by the RCP and is contracted by the Healthcare Quality Improvement Partnership (HQIP).
- 6.2 According to this contract, the RCP and the NRAP team must ensure we avoid all potential and actual conflicts of interest that may arise in delivering the contract.
- 6.3 HQIP and NRAP are subject to the Freedom of Information Act (FOIA). Should we receive a FOI request for access information that relates to potential or actual declarations of interest, any individual covered by this policy will promptly supply, on written request and without charge, all information required to support FOI requests.

National Respiratory Audit Programme: Declaration of Interests Form

An interest is any arrangement as defined on page 2 of this policy, but not limited to any other actual or potential interests not mentioned here which should be declared. If you answer 'yes' to any of the questions below, please provide details on a separate piece of paper.

	Yes	No
Do you or any of your immediate family receive sponsorship or paid consultancy work within commercial organisations related to or conflicts with overall aims of the work of the National Respiratory Audit Programme and/or the Royal College of Physicians?		
Does your department or unit receive financial support from commercial organisations whose work is either related to or conflicts with the overall aims of the work of the National Respiratory Audit Programme and/or the Royal College of Physicians?		
Are you a consultant or member of any national body, charity, lobbying or patient group whose work or aims are related to or relevant to that of the National Respiratory Audit Programme and/or the Royal College of Physicians?		
Do you receive significant editorial fees (payments over £5,000) for commissioned articles for publications (in any format) or are you paid for editorial work for any publication related to or that conflicts with the overall aims and work of the National Respiratory Audit Programme and/or the Royal College of Physicians?		
Do you or your department hold a patent (existing or pending) related to the work of the National Respiratory Audit Programme and/or the Royal College of Physicians?		
Do you hold membership of any political party or private organisation that could have a bearing on the work of the National Respiratory Audit Programme and/or the Royal College of Physicians?		
Any other conflicts not covered by the above.		
<ul style="list-style-type: none"> • I understand that it is my responsibility to inform the National Respiratory Audit Programme (NRAP), if during my membership to a NRAP group, my name is removed from the Medical Register, or equivalent as appropriate, in any country. • I understand that it is my responsibility to declare any fitness to practice outcomes on my license to practice or affecting my professional registration. • I note that the National Respiratory Audit Programme reserve the right to withdraw membership of any NRAP group appointment. 		

Name:

Signature (*electronic signature accepted*):

Date:

Name of National Respiratory Audit Programme (NRAP) group:

Please return the completed form and any written declarations of interest via:

Email – NRAPinbox@rcp.ac.uk or,

Post – National Respiratory Audit Programme
Royal College of Physicians
11 St Andrews Place
Regent's Park
London, NW1 4LE