

# The International Society of Blood Transfusion Conflict of Interest and Disclosure Policy and Process

#### 1. General

The International Society of Blood Transfusion (ISBT) is an international community of professionals sharing knowledge to enhance transfusion practice. We achieve this by providing opportunities for advancing knowledge and education and by advocacy for the welfare of blood donors and transfusion recipients. Based in the Netherlands, ISBT is a not for profit organization that is recognized as a Public Benefit Organisation by the Dutch Tax and Customs Administration.

ISBT is committed to ensuring the integrity of its medical, scientific, educational, and research activities. The Society acknowledges the key role that its Directors, Standing Committees and Working parties play in assuring its professional reputation and ensuring its ultimate success. This requires individuals in these positions to maintain a high level of independence and avoid any situation in which there could be a personal advantage (direct or indirect), either now or in the future, which could jeopardize their independence, integrity or impartiality or which might impact adversely on the reputation of the Society.

The Society is well served by the fact that many of those involved in its activities have diverse interests and are involved in a number of activities outside the ISBT. These interests enhance the expertise that these individuals bring to the various roles that they fill in representing the Society.

On occasion, situations may exist in which an individual serving the Society in an elected, appointed, or volunteer position or as an employee has some outside interest that could constitute a "conflict of interest", as defined herein, or that could be perceived as constituting a conflict of interest. The ISBT's position is to actively seek to address such issues, preferably before they arise, or, at a minimum, when they become known to the individual and/or the Society.

Generally, a conflict of interest could be said to exist when individuals have material or intellectual interests outside the Society specifically in the field of transfusion medicine and science that could influence or could be perceived as influencing their decisions or actions not to be in the best interest of the Society.

The intent of this policy is not to prevent members of ISBT who have relevant relationship(s) with commercial interest(s) or other interests from involvement in the activities of the Society but rather to ensure that ISBT promotes an environment whereby decisions are made that are independent of control from commercial, and other, interests and free of commercial bias. Openness and transparency about possible conflicts of interest is important to maintain integrity and public trust in the organization.

The atmosphere ISBT wishes to create is one in which individuals are comfortable asking questions relating to conflict of interest without feeling awkward or accusatorial and where recusing one's self from participation in discussions that might be perceived as constituting a conflict is the norm rather than the exception.

## 2. Who is covered by this policy?

The policy covers individuals who hold positions of influence and or authority within ISBT. This includes:

- Members of the ISBT Board (including observers)
- Chairs and members of Standing Committees
- Officers of Working Parties as defined in the ToRs
- ISBT Employees

Candidates for membership of the ISBT Executive and Board will be required, as a condition on acceptance of their nomination, to provide a 'limited disclosure' summary that will be made available to members at the time of the election.

The ISBT Board will be responsible for ensuring that similar arrangements are in place for members of the ISBT Foundation Board and the Vox Sanguinis Editorial Board.

The European Board for Accreditation in Haematology (EBAH) requires all speakers at ISBT Congresses to complete a Disclosure form as a condition of accreditation.

#### 3. Types of Interest

For the purposes of this policy, an 'interest' includes any activity or involvement that has the potential, or which might be perceived, to influence the decisions or actions of an individual resulting in an outcome that might not be in the best interests of the Society. These include both financial and non-financial interests.

#### a. Commercial and Financial Interests

A 'commercial interest' involves a relationship with any entity producing, marketing, selling, re-selling, or distributing health care goods or services consumed by healthcare professionals that relates to the activities of the Society.

Academic consulting and fees from such institutions are not considered to constitute an interest and do not need to be declared. This exemption does not apply if the activity is sponsored by an organisation that meets the definition of a commercial interest (as identified in the paragraph above).

Financial interests are defined as those relationships that are ongoing or have occurred within the past 12 months in which the individual benefits by receiving a salary, royalty, intellectual property rights, consulting fee, honoraria, ownership interest (like stocks, stock options or other ownership interest, excluding diversified mutual funds), or other financial benefit. This includes contracted research, speaker/lecturer fees, membership on advisory committees or review panels, board membership, involvement in any other activities for which remuneration is received or expected.

An interest is defined by the nature of the relationship and not by the sum of money involved. The impact of any given sum of money on an individual will vary according to their individual circumstances. The purpose of this policy is to identify potential and perceived interests in an open and transparent manner.

The Society considers relationships of any person required under this policy to include financial relationships of a spouse or life partner.

#### b. Other Interests

These may include, but are not limited to, the following situations: leadership position (voluntary or compensated) in another organization involved in the fields of transfusion medicine and science; non-compensated consultancy; and leadership position (voluntary or compensated) in foundations/fundraising organisations in transfusion medicine and science.

A conflict of interest may also exist if an individual serving as an Officer, Board Member, Editor of any of the Society's publications or Congress President were simultaneously serving in a similar or otherwise significant leadership position with another organisation (profit or nonprofit) having a mission that substantially overlaps with that of the Society.

The Society, therefore, requires that individuals in positions covered by the Policy or who are candidates for the positions disclose whether they currently hold a similar leadership position with another relevant entity. If this is the case, they agree to disclose such information and work with the Society, and the

Board, to find a way to avoid any potential conflicts by excluding themselves partially or completely from their designated ISBT activity where they are judged to have a conflict of interest.

In addition, individuals covered by the Policy agree that should they consider accepting positions with organisations, which may result in a conflict of interest, they will immediately inform the ISBT and work with the Society, and the Board, to find a way to avoid any potential conflicts by excluding themselves partially or completely from their designated ISBT activity. This aims to avoid the development of conflict of interest.

#### 4. Disclosure of Conflicts of Interests

A key element in transparently dealing with and avoiding conflicts of interest is to ensure that a system is in place under which those serving the Society are well aware of what constitutes a conflict of interest, are open and willing to deal with conflicts for the benefit of the integrity of the Society and its programs and provide full disclosure of any relevant interest.

Accordingly ISBT has developed this policy and requires individuals acting in leadership positions in the Society, as defined in section 2, to follow it. This will include a requirement to document interests using the prescribed form on an annual basis. In addition individuals covered by this policy are expected to notify the Society in writing if a new conflict of interest arises that has not previously been noted through the disclosure process.

The Society commits to hold the information provided by this process in a confidential manner. It will only share disclosures outside the organisation should this become legally required or otherwise necessary as determined by the Board of ISBT and after first notifying the individual.

#### 5. Assessing, Managing, Reporting and Resolving Conflicts of Interest

#### a. The assessment and resolution process

The Secretary-General will have overall responsibility for oversight and management of the disclosure process and will inform the Board in the event that a significant concern arises through the process.

The process by which any individual's disclosed information is assessed, and the evaluation as to any level of "conflict", begins with the prompt and full disclosure by the individual involved.

On an annual basis, disclosures will be collected by ISBT staff via electronic means and shared with the Secretary-General. The information will then be assessed taking into account known and anticipated activities of the Society to determine whether potential conflicts of interest exist using the system identified below.

In the event that the circumstances of an individual covered by this policy changes and new potential conflicts arise then the covered individual is required to notify the change, in accordance with the policy, as soon as practically possible.

The Secretary-General, with the support of ISBT staff, will share all relevant disclosures with

- The President for disclosures by members of the Board including observers, the Executive Director and chairs of Standing Committees and Working parties
- The Chair of the relevant Standing committee for members of the committee
- The Chair of the Working Party for Officers of the Working Party
- The Executive Director for employees of the Society.

When the question of a conflict exists, it will be fully discussed with each side given the opportunity to state why they believe the conflict does or does not exist. When this process identifies a conflict of interest, the Secretary-General, in consultation with the relevant chair and individual involved, will be

responsible for the determining what action is required to manage the conflict. Possible approaches include, but are not limited to,

- Ensuring that the individual does not participate in discussions on relevant topics without full disclosure:
- 2. Excluding the individual from participating in decision-making discussions or casting a vote on relevant topics;
- 3. Ensuring that the individual does not imply that she/he is acting on behalf of the Society when discussing the relevant subject with third parties;
- 4. Ensuring that the individual clarifies with third parties when she/he deals on the relevant topic that she/he is not acting on behalf of the Society; or
- 5. Requiring a commitment from the individual not to share confidential information relating to the activities of the Society.
- 6. Requiring an individual to choose between the competing activities and if necessary requiring the individual to stand down from their position within the Society.

The appropriate action(s) will take into account the nature and extent of the individual conflicts and be determined following a considered risk assessment by those involved. In the event that this process fails to gain agreement, the Secretary-General will be responsible for escalating the discussion to the next organisational level.

The Executive Committee of ISBT will have overall responsibility for decisions on management plans for Conflicts of Interest.

Nothing in this policy is intended to remove the rights of individual members contained in the Statutes and Bye-Laws of the Society. In the event that there is on-going disagreement on the existence or appropriate management of the conflicts then the procedure for the investigation and management of alleged misconduct contained in section 7 of the Bye-Laws will apply.

#### b. Management of identified Conflicts of Interest

The Society, via the Chairs of committees and working parties and/or Secretary General, is responsible for identifying and resolving all disclosed interests and those that should arise without disclosure, prior to carrying out its activities.

Each year the committee chairs will receive a report of the declared conflicts for each committee member, including agreed actions to manage the conflict, so that she/he can facilitate the proper management of conflicts.

Each meeting of a committee covered by the policy should begin with a statement concerning the policy and the key processes for managing conflicts.

- The chair is responsible for ensuring that known conflicts are disclosed and that no member acts inappropriately
- Members should be reminded of their duty of care to avoid conflicts of interest as part of their participation in the work of the respective committee.
- Individuals covered by the policy are responsible for ensuring that they abide by the agreed plan for management of the conflict.
- When a subject comes up that presents a potential conflict, the member must state the conflict, refrain from participating in decision-making or voting on that particular issue by leaving the room. Such actions should be noted in the minutes of the meeting.

# c. Failure to comply with the Policy and agreed approaches to management of individual conflicts

The procedure for the investigation and management of alleged misconduct contained in section 7 of the Bye-Laws will apply in the event that an individual fails to complete the necessary disclosures, fails to identify all conflicts in their disclosure, or fails to abide by the agreed plan for management of the conflict.

# d. Declaration of interests for speakers at ISBT Congresses and events

The Scientific Secretary, in collaboration with the Executive Director, shall ensure that the requirements of the Congress Accrediting authority, currently the European Board for Accreditation in Haematology (EBAH), are met for both abstract submissions and speakers at ISBT events.

## **Acknowledgements**

This policy draws on the structure and content of the *Conflict of Interest and Disclosure Policy and Process* of the International Society for Haemostasis and Thrombosis. ISBT acknowledges and thanks ISTH for this.