

SPECTRUM Management of Interests & External Interactions

A SPECTRUM POLICY DOCUMENT

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CHANGE HISTORY

This policy was originally approved by the Strategic Management Group on April 26th, 2021.

Printed copies of this document are not controlled – should you wish to access the latest version of the policy, please email the Consortium Manager (Sancha.martin@ed.ac.uk).

Change Made By	Effective Date	Summary of change	If significant, who approved the change:
Sancha Martin	06/05/2021	Addition of question to section 8 confirming that the person completing the form has read the policy document.	
Sancha Martin	15/03/2021	Authorship, Citation and Funding acknowledgement added. Version updated.	
Sancha Martin	21/04/2021	Corrected affiliation details. Insertion of DOI reference.	

1. Funding & Acknowledgements

SPECTRUM is supported by the UK Prevention Research Partnership (MR/S037519/1), which is funded by the British Heart Foundation, Cancer Research UK, Chief Scientist Office of the Scottish Government Health and Social Care Directorates, Engineering and Physical Sciences Research Council, Economic and Social Research Council, Health and Social Care Research and Development Division (Welsh Government), Medical Research Council, National Institute for Health Research, Natural Environment Research Council, Public Health Agency (Northern Ireland), The Health Foundation and Wellcome.

We are grateful to the members of our International Advisory Board for their advice and guidance regarding the development of this policy in addition to the members of our Interest and Interactions Review Group who provide support and guidance to the Consortium.

2. Authors & Citations

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When citing this work, please use: Martin S, Fitzgerald N, Arnott D, *et al.* "SPECTRUM Consortium: Management of Interests and External Interactions Policy."
<http://dx.doi.org/10.7488/era/2074>.

3. Purpose of this Document

The *SPECTRUM Management of Interests and External Interactions* document aims to make clear the official position of the Consortium with respect to engagement with external partners particularly where they may constitute, or give rise to, a conflict of interest or present a reputational or other risk to the Consortium

Additionally, it:

- clarifies what interests and interactions are covered by the policy,
- explains what is meant by conflict of interest,
- provides guidance to members on the processes for proactively identifying risks and conflicts in order to prevent them, and how to mitigate and manage them if and when they do arise.

All those involved in SPECTRUM should use this guidance to help mitigate or eliminate risks to their objectivity in the case of a secondary financial, non-financial, relationship, or other secondary interest that has the actual, potential, or perceived ability to impair their objectivity while conducting SPECTRUM related research/activities.

4. Definitions

“Alcohol Industry”

For the purposes of this document the term "alcohol industry" means manufacturers of alcoholic beverages, wholesale distributors, major retailers and importers that deal solely and exclusively in alcohol beverages or whose primary income comes from trade in alcohol beverages.

In addition, in this document the term "alcohol industry" includes business associations or other non-State actors representing or funded largely by any of the afore-mentioned entities, as well as alcohol industry lobbyists and commercial interests in alcohol beverage trade other than above when the interaction with SPECTRUM can be linked to their interests in alcohol beverage trade. Other non-State actors who receive funding from the alcohol industry (including funding for research) or have considerable links to the above-mentioned entities should be reviewed on an ad hoc basis in order to determine whether they should also be viewed as “alcohol industry”.

“Cannabis Industry”

The cannabis industry is composed of legal cultivators and producers, consumers, independent industrial standards bodies, ancillary products and services, regulators and researchers concerning cannabis and its industrial derivative, hemp.

“Conflict of Interest”

A conflict of interest arises in circumstances where there is potential that professional judgment or actions regarding a primary interest (e.g. SPECTRUM’s work) will be

unduly influenced, or may reasonably be perceived to be unduly influenced, by a secondary interest. A potential or actual conflict of interest may also pose a reputational risk for SPECTRUM. Conflicts of interest can be of a financial or non-financial nature or both, and may exist at the individual or institutional level.

- **“Individual Conflict of Interest”**

A conflict as defined above involving an individual that may actually, or reasonably be perceived by others in the public health community to unduly, impair or unfairly influence their professional judgement when executing their role within the Consortium.

- **“Institutional Conflict of Interest”**

A circumstance, situation or interaction as defined above involving a SPECTRUM member organisation or affiliate and an external organisation that may actually, or reasonably be perceived by others in the public health community to:

- a) Unduly influence SPECTRUM’s primary aim and objectives and/or
- b) Unduly influence the independence and objectivity of SPECTRUM’s work.

“E-cigarette/Vaping Industry”

E-cigarettes, also known as electronic cigarettes or Electronic Nicotine Delivery Systems (ENDS), work by vaporising nicotine liquid. They consist of a battery, a cartridge (disposable, replaceable or refillable) with liquids (called ‘e-liquids’) and a heating mechanism. This heats the cartridge ingredients to create a vapour that is inhaled by the consumer (the ‘vaper’). They do not contain tobacco and there is no combustion or smoke, but some produce ‘clouds’ of vapour. In this policy, the phrase "E-cigarette/vaping industry" refers to product manufacturers, producers, processors, wholesale distributors, importers, sellers and marketers of such devices and products. *NB: Although some vaping products are developed and produced independent of tobacco industry involvement, there are known to be strong links between the vaping and tobacco industries. Tobacco vaporisers are considered to fall under the definition of the tobacco industry above.*

“Financial interest”

When a person derives direct financial benefit such as anything of monetary value, including, but not limited to, pay, commission, consultancy fees, equity interests, forgiveness of debt, property, royalties, travel expenses, in-kind support, and intellectual property rights.

“Gambling Industries”

Any individual or company that provides betting, gambling or lottery services. This includes licensed adult gaming centres or family entertainment centres (also referred to as arcades), lotteries, gaming machines [including online gaming, and simulated gambling] and online or in person betting, bingo or casinos.

“Interaction”:

Interactions occur on a daily basis, may be scheduled or unscheduled and are a source of a potential conflict. In this policy this term relates to any active participation in work-related communication or contact via email, phone or in person, including via a third party.

“Interest Review Group”

A group of individuals nominated and authorised by the Strategic Management Group whose full role and responsibility is defined within their Terms of Reference as approved by the SMG. The Chair of this group is Professor Cecile Knai. (Copies of the Terms of Reference are available from the Consortium Manager).

“Non-financial interest”

Any non-financial benefit or advantage, including, but not limited to, enhancement of an individual’s career, education or professional reputation; access to privileged information or facilities.

“Pharmaceutical Industry”

Any company involved in the legal discovery, development, production, and/or marketing of pharmaceutical drugs as medicines and diagnostic agents.

“Professional Collaboration”

Any previously agreed or contracted interaction or exchange that involves a defined exchange of knowledge, experience or other information for the benefit (financial or otherwise) of one or other party, or both parties, in the relationship including any interaction or exchange which could reasonably be construed as a shared endeavour or partnership, including, but not limited to, co-authoring a text, working on the same project or study, or sitting on a committee or working group together.

“Reputational Risk”

The potential for negative publicity, negative public perception or uncontrollable events to have an inappropriate adverse impact on the Consortium’s reputation which then calls into question the integrity of, credibility of or trust in SPECTRUM’ research, management, or its Members or Affiliates by association. Such risks include concerns regarding the integrity of the Consortium, suggestions of improper direction of work or use of resources, and any delays or restrictions to publication are examples of reputational damage.

“SPECTRUM Affiliate”

An individual or institution that is contributing intellectually and/or practically to the activities of the SPECTRUM Consortium without financial recompense and is not a signatory to the SPECTRUM Collaboration Agreement

“SPECTRUM Member”

An *individual* specifically named within the SPECTRUM award from the UKPRP in the role of co-investigator, named researcher, early career research or administrative support. It also includes individuals not specifically named in the award who receive funding of any kind from the SPECTRUM award.

“SPECTRUM Member Institution”

An institution specifically named within the SPECTRUM award from the UKPRP or is a signatory to the SPECTRUM Collaboration Agreement.

“Strategic Management Group (SMG)”

The SMG is responsible for overall coordination of the Consortium's activities. The SMG is chaired by the Director and includes the Deputy Directors, Work Package Leaders, other co-applicants and partner representatives. The primary function of the SMG is to apply appropriate governance procedures across the Consortium in order to oversee delivery of plans set out in the original proposal, through robust monitoring and evaluation processes. The SMG shall create and delegate responsibility for the ongoing review of conflicts to the IRG.

“Tobacco Industry”

A tobacco product is any product made entirely or partly from the tobacco leaf as raw material which is manufactured to be used for smoking, sucking, chewing or snuffing as well as heated tobacco products that produce an emission containing nicotine and other chemicals, which is then inhaled by users. In this policy, the phrase "tobacco industry" refers to tobacco product manufacturers, producers, processors, wholesale distributors, importers, sellers and marketers of tobacco products. It includes any parent, affiliate, branch, or subsidiary of a tobacco or tobacco product manufacturer, wholesale distributor, importer, retailer.

In addition, in this document the term "tobacco industry" includes business associations or other non-State actors representing or funded largely by any of the afore-mentioned entities, as well as tobacco industry lobbyists and commercial interests in tobacco trade other than above when the interaction with SPECTRUM can be linked to their interests in tobacco trade. Other non-State actors who receive funding from the tobacco industry (including funding for research) or have considerable links to the above-mentioned entities should be reviewed on an ad hoc basis in order to determine whether they should also be viewed as “tobacco industry”.

“Unhealthy Commodity Industry - UCI”

For the purposes of this document: this term is used to collectively refer to the alcohol, tobacco or UP/HFSS food industries as defined above.

However, whenever and wherever this term is used, consideration should be given to any companies who manufacture, produce, process, distribute, import, sell and/or market other products or services, (including any company that derives significant revenues from producing, selling or marketing such products or services) that could be considered detrimental to physical or mental health and, as a result, profit from their sale. Examples include cannabis, gambling and vaping industries as defined above.

“Ultra-Processed HFSS Food Industry” (UP/HFSS Food)

Whilst “food industry” in general refers to a range of businesses that supply most of the food consumed across the globe, in the context of this document, this policy is concerned with manufacturers, producers, processors, wholesale distributors, importers, sellers and marketers of ultra-processed, high salt, high sugar and high fat products (‘UP/HFSS’ products including soft drinks and infant formula) and any company that derives significant revenues from producing, selling or marketing of these products.

In addition, in this document the term " Ultra-Processed HFSS Food Industry " includes business associations or other non-State actors representing or funded largely by any of the afore-mentioned entities, as well as UP/HFSS food industry lobbyists and commercial interests in UP/HFSS food trade other than above when the interaction with SPECTRUM can be linked to their interests in such trade. Other non-State actors who receive funding from the HP/HFSS food industry (including funding for research) or have considerable links to the above-mentioned entities should be reviewed on an ad hoc basis in order to determine whether they should also be viewed as “UP/HFSS food industry”.

NB: Whilst it is acknowledged that commercial companies within this sector of the food industry may produce healthy foods, in addition to UP/HFSS product lines, the associated risk of conflict remains valid.

5. Introduction

The Shaping Public Health Policies To Reduce Inequalities and Harm (SPECTRUM) Consortium is generating new evidence to inform the prevention of non-communicable diseases (NCDs) arising from the consumption of unhealthy commodities. It has a particular focus on the role of unhealthy commodity industries (UCIs) and commercial determinants of health related to NCDs and wider public health issues.

Unhealthy commodities such as alcohol, tobacco and ultra-processed foods (including those high in fat, salt and sugar) are known to be risk factors for NCDs and their increasing levels of consumption are generally, but not exclusively, driven by transnational corporations involved in the production, manufacture and sale of such commodities.

The focus of the SPECTRUM Consortium is to carry out research **on** UCIs as opposed to **with** such industries.

SPECTRUM staff have multiple roles both within and outwith the Consortium and have external relationships that are many and varied. As a result, current or potential conflicts of interest and interactions with the commercial sector are expected to arise. This is often through circumstances entirely beyond the control of an individual or which could not be foreseen. Recognising and reporting that a conflict of interest may exist, or seeking advice on a potential conflict or interaction, is entirely proper, and reflects positively on an individual's integrity.

Members of the SPECTRUM Consortium have a duty to consider the implications of any past, current or potential external relationships or circumstances that may, or could be perceived to, undermine the aims or reputation of the Consortium. These may relate to products or other public, private or third sector organisations in addition to those unhealthy commodity industries specifically defined above.

SPECTRUM members are encouraged to engage with the Interest Review Group (IRG) in confidence and good faith to discuss any potential or perceived conflicts to obtain advice, ideally, where possible, prior to any conflict or interaction arising. This consultation can be undertaken any time and is strongly encouraged prior to submission of formal documentation of the circumstance. The IRG will provide support and advice to any and all members of the Consortium to help identify and manage any circumstances which have led or could lead to a potential or actual conflict of interest.

There may be scenarios where retailers, advocates or others working with the producers of unhealthy commodities participate in research studies – but have no role in the design, execution, interpretation or publication of those studies. Such studies may be permitted as part of SPECTRUM with **prior** approval of the Interest Review Group. It is recommended that any such interactions that pre-date this policy or are unrelated to SPECTRUM are declared using the form provided for information and transparency.

Definitions are provided for specific industries directly relevant to SPECTRUM research in section 1, however, individuals have a duty to take a broad interpretation of circumstances that fall under the above scope, and apply the policy accordingly (see Section 4 below for further details on the scope).

The policy therefore covers, *but is not limited to*, interactions or conflicts relating to other potentially unhealthy commodity industries such as vaping, cannabis, gambling in addition to other external commercial sectors such as the pharmaceutical industry and those affiliated with or funded by them whether in the private or other sectors.

6. Scope

The policy is intended to cover any circumstances that have led, lead or have the potential to lead to an actual or perceived conflict of interest and/or any interactions or activities which could potentially pose a reputational risk to the SPECTRUM Consortium (either to its research or the individuals involved).

To ensure the highest integrity and public confidence in its activities, this policy applies to anyone affiliated with the SPECTRUM Consortium, whether they are Members or Affiliates and includes all named investigators, employees, and experts serving in an advisory capacity, anyone co-opted (either formally or informally) to working groups and/or in any other position related in any way with SPECTRUM.

7. Responsibilities

SPECTRUM Members and Affiliates have the following responsibilities:

- **To be informed:** SPECTRUM members and affiliates of the Consortium are responsible for familiarising themselves with and complying with this policy and recognising situations which are or could be perceived, or have the potential in future, to be in conflict with the goals and governance of the Consortium. All SPECTRUM members, affiliates and individuals who wish to join SPECTRUM must endorse this policy and the position statement below.
- **To be transparent:** Individuals are required to report any financial, professional or other interest within the past four years of the date of completion of the Declaration of Interest form (including any that ended within that time period) when first joining the Consortium. After this point, interests should be declared when they arise and annually in response to a request from the IRG.
- **To be vigilant:** Remain vigilant for circumstances as defined in the scope, notify the IRG in all cases, taking a broad interpretation. If in doubt, individuals are encouraged to seek advice.
- **To cooperate:** Work with others in the spirit of transparency in the Consortium including the IRG as needed to understand circumstances arising, and act on their advice in order to comply with this policy.

The **Strategic Management Group** is responsible for ensuring that this policy is implemented and reviewed appropriately. The SMG shall create and delegate responsibility for the day to day review of circumstances falling under the scope of the policy to the IRG.

The **Interest Review Group** is responsible for developing and maintaining the Interests Policy Framework for the Consortium, reviewing Declarations of Interests, providing support and guidance to others, escalating risks and issues and providing

recommendations to the SMG and others within the Consortium as requested.

8. SPECTRUM Position Statement

Members of SPECTRUM must not:

- accept funds from UCIs for any reason;
- collaborate professionally with the alcohol and tobacco industries whether there is any financial recompense for doing so or not, unless there is an exceptional reason for doing so, after consultation with the IRG, and acting in response to the advice provided by the IRG;
- collaborate professionally with the UP/HFSS industry without seeking advice from the IRG for ongoing or new collaborations after the enactment of this policy;
- collaborate professionally in any way with other individuals who are known to accept funds or who themselves collaborate professionally with the alcohol and tobacco industries unless there is an exceptional reason for doing so, after consultation with the IRG, and acting in response to the advice provided by the IRG. . In the case of UP/HFSS food industry, advice should be sought from the IRG on a case by case basis;
- deliberately interact with these industries in any other way, other than in the course of research or consultation and acting following the provision of advice from the IRG.

Dialogue with certain UCIs may be permitted where clear guidelines for the management of that dialogue are in place – guidelines and advice are available from the IRG. Meetings hosted by government ('acceptable' 3rd parties) and where a variety of inputs are not intended to be included in the above but nonetheless should be declared, and advice sought if in doubt.

Individuals may choose to sever any professional relationship which is in breach of the above rules or responsible for a conflict of interest, or may divest any relevant financial interests prior to completing the Declaration of Interest form. However, such actions will not entirely nullify the previous existence of the conflict and details of such actions that have occurred within the last four years must still be provided as outlined in the Declaration Form.

Answering "Yes" to a question on the Declaration Form does not automatically disqualify individuals or limit their participation in SPECTRUM. The Interest Review Group (IRG) will review all circumstances on a case by case basis. The IRG may conclude that no potential conflict exists or that the interest is irrelevant or insignificant. Therefore, those completing the form are encouraged to declare any and all relationships that they are unsure about as soon as possible.

9. Procedure

9.1.1. Initial disclosures.

All those affiliated with SPECTRUM are required to complete a Declaration Form as soon as they join the Consortium and will be asked annually thereafter if there have been any changes to their list of declared interests.

9.1.2. New circumstances under consideration or where advice is sought on whether declaration is required.

Where circumstances arise that may fall under the scope of this policy, individuals should discuss and solicit advice from the IRG as early as possible about whether the circumstances require declaration under this policy and/or to minimise any risks arising. To do so, please contact the IRG Secretary/SPECTRUM Consortium Manager to discuss.

9.1.3. Declarations of conflicts and/or interactions, including new circumstances not previously declared

The general rule is that as soon as a situation or relationship is thought about as a potential conflict or at the time the actual conflict arises, if not previously identified, a disclosure should be made in writing to the Chair of the IRG and Consortium Manager.

The process in this case is as follows:

- a. Disclosures should be made by completing/updating the Declaration of Interest (DoI) form or alternately in writing (by email) or verbally to the Consortium Manager as soon as they are identified.
- b. The information provided will be reviewed by the IRG to determine whether there is a conflict of interest or reputational risk relevant to the subject at hand that will or will not impact the role of that Individual within the SPECTRUM Consortium or the wider reputation of SPECTRUM or its research.
- c. The IRG will review declarations made to determine if any interests or interactions have the potential to undermine the reputation of SPECTRUM and/or affect the individual's objectivity in the conduct of their role within SPECTRUM to a serious degree. The IRG is expected to classify their decisions in one of three main ways. The decision will be accompanied by advice from the IRG on the management of the circumstance.
 - i. The declared circumstance is not a conflict as defined by SPECTRUM or does not pose a reputational risk, or it is not a significant enough conflict or risk to warrant action and either should be kept under review or closed.
 - ii. The declared circumstance poses a sufficient conflict or reputational risk to require exclusion of the individual from specific topics or aspects of SPECTRUM activity.

- iii. The declared circumstance is of a sufficiently serious conflict or reputational risk that it merits exclusion of the individual entirely from SPECTRUM.

9.1.4. Recording of Declarations

A summary of all declarations and actions taken to manage any interests or interactions deemed to pose a conflict or be an actual risk to the Consortium may be published in resulting reports and work outputs and shared with the UK Prevention Research Partnership.

Furthermore, if the objectivity of the work in which the individual is involved is subsequently questioned, the contents of their Declaration Form may be made available by the SMG (after consultation with the IRG) to persons outside SPECTRUM if, after consulting with the individual, the IRG considers such disclosure to be in the best interest of the Consortium and they are compelled to do so by obligation (such as disclosure to the Funding Body).

In recognition that our Alliance partners are, in some cases, an amalgamation of smaller groups and bodies, we do not require that they provide a Declaration for every member of their Alliance. Rather, only those individual representatives of those Alliances who participate *directly* in SPECTRUM activities and internal meetings will be required provide an individual Declaration Form. Similarly, academic individuals are not expected to report any other collaborations and funding which their employing University receives which may be in conflict with this Policy for activities – unless they are directly involved.

Please note that not fully completing and disclosing all relevant or potentially relevant information on this form may, depending on the circumstances, lead SPECTRUM to exclude the individual from some or all future SPECTRUM activities.

By completing the Declaration Form individuals agree to these conditions. If they are unable or unwilling to disclose the details of an interest or interaction that may fall under the scope of this policy, they must disclose that such circumstances may exist. Note that in this case, the IRG/SMG will be unable to permit their engagement or participation in SPECTRUM research, activities and/or events without further details.

8 Declaration Form

Your Name:

Your Employer:

Email Address:

Date:

- *When completing this form, you should consider your individual circumstances and declare anything which you think is relevant.*
- *You should consider and describe any and all conflicts, interactions or interests including any which have been initiated, are active, or have ended within the past four years from the date you are completing this form.*
- *If in doubt about whether a collaboration or interaction is covered by the scope of the policy as outlined above, please give brief details and highlight to enable the IRG to review and advice. This includes known indirect interests relating to those close to you, such as family or friends.*
- *If you have accepted funding of any kind from a UCI within the past eight years, this should be declared.*
- *The SPECTRUM Management of Interests and External Partners Policy focuses specifically on the alcohol, food and tobacco industries that were identified as a key area of interest to the SPECTRUM Consortium as outlined in the UKPRP Project Plan, however, please consider other commercial sectors whether they may be considered to be potentially unhealthy (for example gambling, cannabis or vaping industries) or not (such as the pharmaceutical industry), as well as any other circumstances falling under the scope of the policy.*
- *Please refer to the definitions as outlined in Section 2 of this policy document, noting in particular the broad definitions of each industry, financial and non-financial interest, 'professional collaboration', 'interaction' etc.*
- *Academics do not need to complete the form to reflect their Universities potential or actual conflicts that do not directly involve them.*
- *Those employed by other organisations should declare any known actual or potential institutional conflicts of interest.*
- *Please answer each of the questions below.*

Have you read and understood the SPECTRUM Management of Interests & External Interactions document?

Yes No

If yes, continue to the next section.

If yes, but there are points which are unclear and you do not understand, please contact the Consortium Manager in the first instance.

If no, please read the document prior to completing this form.

8.1 FINANCIAL INTERESTS (FI)

Do you have any financial interests relating to UCIs as defined above or any other commercial sector or industry, including, but not limited to, receipt of pay, commission, consultancy fees, equity, forgiveness of debt, property, royalties, travel expenses, in-kind support, or anything of monetary value?

Yes No

During the past 4 years, have you held a paid office or other post, where you represented interests or defended a position related to the areas of interest to SPECTRUM with the intention of benefiting or promoting UCIs or any other commercial sector or industry?

Yes No

As part of a regulatory, legislative or judicial process, have you provided expert opinion or testimony, for the benefit of UCIs or any other commercial sector or industry for which you have been financially reimbursed?

Yes No

Do you have any intellectual property rights (IPR) relating to a UCI or any other commercial sector (such patents, trademarks, or copyrights, proprietary know-how in a substance, technology or process) that might be enhanced or diminished by the outcome of SPECTRUM’s research?

Yes No

If you answered yes to either of the above questions, please describe the nature and type of each and every FI or IPR being declared, in as much detail as might be required to understand the level of conflict or risk for SPECTRUM including the subject, specific circumstances, parties involved, time frame and other relevant details under the following headings (i-vi) as applicable.

i. To which industry does the FI relate?

Alcohol Industry Food Industry Tobacco Industry
 Other Industry Please specify.....

ii. Timing/timeframe (date of benefit; or period of time over which a project was funded etc.):

iii. Description of FI/IPR including circumstances

iv. Monetary value (estimated if necessary, if not disclosed, will be assumed to be significant):

v. Name of company, organisation or institution which provided the financial benefit

vi. Parties involved e.g. you, a colleague, employer, team, research unit or other?

8.2 NON-FINANCIAL INTERESTS OR INTERACTIONS (NFI)

Have you received any non-financial benefit or advantage, including, but not limited to, enhancement of an individual’s career, education or professional reputation; access to privileged information or facilities as a result of interactions with UCIs or any other commercial sector or industry?

Yes No

To the best of your knowledge, have you had any professional collaboration with any UCI, or with an entity or individual which has received funding from, or themselves have a professional collaboration with, UCIs or other commercial entity?

Yes No

As part of a regulatory, legislative or judicial process, have you provided unpaid expert opinion or testimony, for the benefit of a UCI or other commercial entity or industry?

Yes No

During the past 4 years, have you held an unpaid office or other post, where you represented interests or defended a position related to the areas of interest to SPECTRUM with the intention of benefiting or promoting UCIs?

Yes No

If you answered yes to any question in this section, please describe the nature and type of NFI or interaction being declared in as much detail as might be required to understand the level of conflict or risk for SPECTRUM including the subject, specific circumstances, parties involved, time frame and other relevant details under the following headings (i-vi) as applicable.

i. To which industry does the NFI or interaction relate?

Alcohol Industry Food Industry Tobacco Industry
 Other Industry Please specify.....

ii. Timing/timeframe (date or period of time etc.):

iii. Description of NFI/Interaction including circumstances

iv. Name of company, organisation, and/or individuals involved

8.3 ALL SOURCES OF FUNDING

Please list all other sources of funding, or financial reward, including other

employments/consultancy/paid expert work for public/third sector organisations etc. not declared elsewhere on this this form, that you have accessed or been awarded to undertake research in the 4 years prior to the date you are completing this form adding additional rows to the table as required.

Funding Body	Title	Amount Awarded	Start Date	End Date	Other partners

8.4 OTHER DISCLOSURES

Do you have or have you had any financial or non-financial interests or any interactions relating to any other sector or industry (whether commercial or non-commercial) that have led, lead or have the potential to lead to an actual or perceived conflict of interest and/or any interactions or activities which could pose a reputational risk to the SPECTRUM Consortium (either to its research or the individuals involved)?

Yes No

Do you have, or are you aware of any other circumstances not declared elsewhere in this form which have led, lead or have the potential to lead to an actual or perceived conflict of interest and/or any interactions or activities which could pose a reputational risk to the SPECTRUM Consortium (either to its research or the individuals involved) that you wish to disclose or request advice on?

Yes No

If yes, please provide relevant details:

Please detail all positions you currently hold including any advisory roles not declared anywhere else in this form.

Institution	Role	Additional Information

9 Disclosure Consent

By completing and signing this form:

- I agree to undertake to be vigilant of these issues raised in this policy document and to follow the guidance provided which describes how to identify potential risks and conflicts.
- I understand that I can request support and advice from the IRG at any time prior to any interactions which may have the potential to fall under this policy and should do so in advance of any such interactions where reasonably practicable'.
- I consent to the disclosure of any relevant conflicts to other SPECTRUM participants and in the resulting report or work outputs as necessary.
- I agree to promptly notify the SPECTRUM Consortium Manager either verbally or in writing of any new circumstances arising which fall under the scope of this policy AND complete a new declaration of interest form that describes the changes. This includes any change that occurs throughout the time I am affiliated in any way with SPECTRUM and its activities.

DECLARATION. I hereby declare that the disclosed information is true and complete to the best of my knowledge.

Date: _____

Signature: _____

Print Name: _____