

ESC Declaration and Management of Conflict of Interest Policy

The European Society of Cardiology (ESC) is dedicated to reducing the burden of cardiovascular disease and improving the standards of care offered to patients with cardiovascular disease. To accomplish this mission, the ESC provides support for a variety of activities in the areas of research, education, training, and advocacy. The integrity of the ESC and the activities it undertakes depend on the avoidance of conflicts of interest, or even the perception of conflicts, by the individuals involved in these activities.

The ESC has adopted eight principles that underline its commitment to managing real or perceived conflicts of interest, as well as seven policies that lay out how the ESC safeguards the integrity of the programmes and activities in which its membership is engaged. This document constitutes the "ESC Declaration and Management of Conflict of Interest Policy."

I. Principles

Principle 1: The integrity of the ESC and its scientific, educational, and advocacy activities depend on the avoidance of bias arising from conflicts of interest, or from the perception of such conflicts, by the individuals involved in these activities. Personal financial considerations must never be allowed to influence physicians' and scientists' decisions on care of patients, evaluation and development of drugs or devices, or proper conduct of biomedical research. This includes continuing postgraduate medical education (CME) activities provided to physicians by the ESC and the development of clinical practice guidelines which must be free of bias, or perceived bias, evolving from financial arrangements or considerations.

Principle 2: A conflict of interest exists when an individual has material interests that could influence or could be perceived as influencing his/her decisions, actions or presentations in an inappropriate manner. These interests include employment, consultancy, equity, research funding, honoraria, patents and royalties, speakers' bureau involvement, advisory committee or board of directors membership, expert testimony and financial support from a commercial entity. Conflicts of commercial interest may involve either an agent or device concerning the subject in question or an agent or device that might be in competition with the subject in question. The ESC recognizes that there are varying degrees of conflict. All potential conflicts must be disclosed so that the audience or a relevant committee can evaluate the relevance of the conflict to the relevant ESC activity.

Principle 3: The ESC desires a professional environment in which its officers and contributors are comfortable asking questions relating to conflict of interest and where excluding oneself from participation in discussions that might be perceived as constituting a conflict is the norm rather than the exception.

Principle 4: A member of the ESC with a conflict of interest for one specific ESC activity or task is not necessarily precluded from participation in all other ESC activities. In fact, such external relationships may enhance the value of that member to the Society. The ESC does not wish to imply that *any* involvement with a commercial entity prohibits a role within the ESC, but rather that the review of such relationships is appropriate and correct thereby encouraging transparency and ethical integrity.

Principle 5: The ESC subscribes to the view that research and development sponsored by the biomedical industry play an important role in biomedical research and that academic-industrial relationships have developed useful and life-saving products.

Principle 6: The mission of ESC does not include marketing of pharmaceutical or biomedical products. While the ESC offers opportunities for renting of space for commercial exhibitions at the sub-specialty and ESC annual meeting and

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while the Society's publications sell advertising pages, the revenues generated are devoted to the support of the Society's mission.

Principle 7: The ESC policies are congruent with the general positions of European standards of accreditation of CME activities which include: (a) support from a commercial entity for CME must be acknowledged, (b) no employees or consultants in the supporting company can be involved in the development of the CME activities and (c) attendees should be encouraged to report on their perceptions of any possible bias.

Principle 8: The considerations of conflict of interest are relevant not only to clinical research but may extend to all phases of biomedical research, including pre-clinical research.

II. Policies

The requirements of the ESC to declare conflicts of interest apply to all:

1. Volunteers, officers or scientific contributors of the ESC;
2. Directors of the ESC;
3. Presenters at any ESC meeting or to authors of material submitted for any ESC publication.

Policy 1: Some individuals serve as expert witnesses, officers, directors or members of scientific advisory boards of companies, participate in company-sponsored speakers' bureaus, or accept subsidies from a commercial entity for the costs of travel and/or hospitality to an ESC activity. All of these activities must be declared and will be reviewed to identify potential conflicts of interest in a particular ESC activity.

Policy 2: The ESC holds its volunteers serving in governance positions (the ESC Management Group, ESC Board Members, ESC Association Presidents and Boards, ESC Council Chairmen and Board members and ESC Working Group Chairmen and Nucleus members) to certain standards with regard to conflict of interest.

Specifically, when an ESC volunteer has been identified as having a conflict of interest in a particular activity, he/she will not:

1. Take any action on behalf of ESC concerning the subject in conflict or any issue relevant to the subject in conflict;
2. Participate in discussions on the subject without full disclosure;
3. Participate in decision-making discussions or cast a vote;
4. Imply that he/she is acting on behalf of ESC when discussing the relevant subject with third parties;
5. Fail to clarify with third parties with whom he/she deals on the relevant subject that he/she is not acting on behalf of ESC; or
6. Share confidential information, including disclosure of embargoed data which would break laws relating to insider trading.

The ESC strongly recommends that its Officers (i.e. President, President-Elect, immediate Past-President, Vice Presidents, Secretary/Treasurer) refrain from simultaneously serving the Society and holding an officer position with another international medical organization, without prior approval from the ESC. The ESC also strongly discourages the Officers from simultaneous service in any position on the board of organizations with significant overlap with the ESC without prior approval from the ESC.

Policy 3: The ESC has the right to take action regarding ESC members and contributors to ESC activities who have exhibited biased behaviour or action. These actions may include:

1. Requiring an individual to choose between the competing activities.
2. Prohibiting an individual from playing a decision-making role in the ESC relevant to the conflict.

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3. Prohibiting an individual from presenting at ESC events.
4. Exclusion from publishing in ESC publications.
5. Exclusion from participating in ESC committees.
6. Revocation of membership in ESC.
7. Revocation of the ESC title of Fellow of the ESC

Policy 4: No donor, commercial or otherwise, can select speakers or awardees or be involved in the production of ESC educational and/or scientific content, with the exception of satellite or industry organised symposia or session clearly denoted as such.

Policy 5: Commercial support for post-graduate education (or post-graduate CME) must be acknowledged and no employees or consultants of the interested company can be involved in the development of the content of CME of the ESC. Meeting attendees are provided with a formal opportunity to report on their perceptions of any possible bias in their review of the sessions for CME credit.

Policy 6: Special precautions are taken to safeguard against an undue influence with regard to the ESC Research and Training Grants which are targeted at helping trainees.

Policy 7: The ESC sponsors the development of evidence-based clinical practice guidelines. Special policies intended to prevent bias from conflicts of interest apply to participants in the ESC guideline development. These policies are described in the published document "Relations between professional medical associations and the health-care industry, concerning scientific communication and continuing medical education: a Policy Statement from the European Society of Cardiology," published in *European Heart Journal* (2012) 33, 666–674. (1)

III. Process

Education/Awareness

The ESC takes its commitment to preserving the scientific integrity of its programmes through transparency and proper management of conflicts of interest seriously. Over the past several years, the Society has taken a number of steps to educate its leadership and volunteers about the importance of adhering to the ESC Conflict of Interest Policy. In an effort to ensure that sensitivity to potential conflicts is intrinsic to the Society's culture, the following measures have been implemented:

- The Nominating Committee reviews the declarations of interest of potential leadership election candidates to determine any conflicts of interest; agreement to resolve such conflicts and comply with all aspects of the ESC Conflict of Interest Policy relevant to individuals in governance positions is a prerequisite for inclusion on the election slate.
- A new member induction is held biannually for incoming Management Group and Board members (Officers, standing committee chairs and editors-in-chief) which includes a detailed presentation on the ESC Declaration and Management of Conflict of Interest Policy.
- All ESC committees must be aware of and have discussed the ESC Conflict of Interest Policy and processes for managing conflicts.
- Any meeting speaker is provided with a reminder about the ESC Conflict of Interest Policy prior to his/her presentation and will be asked to present a declaration at the beginning of the presentation.

Meeting Programme Design

The ESC fully complies with the guidelines regarding educational programme design and evaluation, ensuring that the programme design, implementation and evaluation processes are free from commercial influence.

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- Each individual in a position to determine the content of an educational activity must disclose all relevant financial relationships that involve the receipt of wages, compensation or other remuneration for their services as an employee or consultant with any commercial interest and follow the Society's policy for managing conflicts.
- The terms, conditions and purposes of any commercial support of the CME programme are documented in a written letter of agreement between ESC and the commercial supporter.
The agreement states that ESC, not the commercial supporter, makes all decisions regarding the educational content of the programme, selection of speakers, and disbursement of commercial support.
- Under no circumstances may honoraria be paid directly to speakers/faculty by commercial supporters for these ESC education events.
- Acknowledgment of corporate support is provided on the ESC website, in the printed meeting materials, and on signage on-site.
- Product promotion and product-specific advertisement of any type are prohibited in or during CME activities.

Administration/Disclosure of Conflicts

To facilitate the collection of information about potential conflicts, the ESC utilizes an online system in which participants in ESC committees, Guidelines Task Forces, publications and programmes enter or update information in real time about their relevant disclosures in a central database.

For publications and CME activities, relevant disclosure information is provided to the audience in conjunction with each activity. The disclosure identifies those in receipt of wages, compensation or other remuneration for their services as an employee or consultant as well as those who report no financial relationships.

Specifically:

- For all ESC CME meetings (including the ESC congresses), invited speaker disclosure information is provided on a slide shown before the presentation. For abstract presentations, the disclosure is included in the abstract itself, both in the print copy and online. Poster presentations contain a disclosure statement on the poster itself.
- In ESC publications, author disclosures are provided in a prominent location.
For committee meetings and study sections, it is critical for participants to be aware of conflicts so decisions can be made without bias. When a subject comes up that presents a potential conflict, the member must state the conflict and refrain from participating in decision-making or voting on that particular issue by leaving the room.

To help ensure that the policy is followed:

- Each year the Audit and Ethics Committees designate a committee member to serve as the Conflict of Interest Compliance Officer to facilitate the proper management of conflicts.
- Disclosures for the officers in the Management Group, the position of the European Heart Journal Editor-in-Chief, Chief Executive Officer and Director of Finance are annually reviewed by the Compliance Officer. In the case of ESC study sections, such as those that review award/grant applications, the conflicts more commonly involve institutional or personal (rather than financial) ties, although the standard process for recusal is followed.

Enforcement

A number of action points are put in place to ensure compliance with the ESC Conflict of Interest Policy and address any violations.

Staff members ensure there is a disclosure slide for each presentation made at an ESC congress.

Session chairs are provided with disclosure information for each of the speakers in their sessions.

The centralized disclosure system allows staff to track and follow up with any individual who neglects to disclose; no one is allowed to participate in an ESC meeting until this is addressed.

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If an ESC volunteer does not comply with the Declaration of Interest (DOI) policy or complete their declaration of interest form annually, they will be asked to step down from their position and cannot contribute to any ESC activity. Such a decision is made by the ESC Management Group of the ESC Board and confirmed by the ESC Board.

In the event that ESC identifies “speaker bias” or “failure to disclose”, a report is presented to the Management Group, Audit Committee and Ethics Committee, which determine consequent action on a case-by-case basis. Such action may range from a written warning to the speaker about adherence to the ESC Declaration and Management of Conflict of Interest policy to prohibition from participation in future ESC events.

Questions

Questions and comments regarding the ESC conflict of interest principles and policies can be directed to

- a) the ESC Secretary/Treasurer at escboard@escardio.org or
- b) the ESC through the “contact us” form on the ESC website

References:

1. Relations between professional medical associations and the health-care industry, concerning scientific communication and continuing medical education: a Policy Statement from the European Society of Cardiology. *European Heart Journal* (2012) 33, 666–674.

Link: [http://www.escardio.org/static_file/Escardio/Web/Documents/Eur_Heart_J-2012-ESC_REPORT-666-74\[1\]%20Policy%20Statement%20.pdf](http://www.escardio.org/static_file/Escardio/Web/Documents/Eur_Heart_J-2012-ESC_REPORT-666-74[1]%20Policy%20Statement%20.pdf)

2. Biomed Alliance Code of Conduct:

Link: http://www.escardio.org/static_file/Escardio/Web/Documents/BioMed-Alliance-Code-of-Conduct%20_5.04.2016.pdf

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