

UK Nutrition and Health Claims Committee: Code of Practice

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Terms of reference and function

The UK Nutrition and Health Claims Committee (UKNHCC) is a committee of independent experts, established in March 2019, to provide scientific advice on the substantiation of scientific evidence underpinning nutrition and health claim applications. It advises the 4 UK authorities and is supported by a Public Health England (PHE) secretariat.

The function of UKNHCC is to assess scientific information in order provide opinions on the validity of scientific evidence supporting applications for use of nutrition and health claims (risk assessment). Decisions on whether to allow nutrition and health claims (risk management) lies with the four UK administrations.

The Code of Practice for Scientific Advisory Committees¹ (CoPSAC) states: “Whether acting proactively or reactively, SACs should expect to operate free of influence from the sponsor department officials or Ministers, and remain clear that their function is wider than simply providing evidence just to support departmental policy”.

The agenda and work load of the UKNHCC are determined by the number of submissions it receives for new nutrition or health claims. Applications will be assessed by the UKNHCC in the order they are received from the UK authorities. The committee will meet up to six times a year to enable the legislative timescales to be met.

Appointment of UKNHCC members

Appointments to the committee are made on merit and in accordance with the principles of the CoPSAC and the Governance Code on Public Appointments issued by the Minister for the Cabinet Office.² The Chair and members are appointed as individuals, on a personal basis, to fulfil the role of the committee, not as representatives of their particular profession, employer or interest group, and have a duty to act in the public interest. Membership is not determined on a geographical basis but on suitability for the role, based on an assessment against criteria specified at the time of the recruitment of new members. New appointments are made through an open competition following advertisement of the roles in, for example, scientific journals and with relevant professional bodies or networks informed about roles that may interest their members.

¹ Government Office for Science Code of Practice for Scientific Advisory Committees
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/278498/11-1382-code-of-practice-scientific-advisory-committees.pdf

² The Governance Code on Public Appointments
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/578498/governance_code_on_public_appointments_16_12_2016.pdf

Criteria for candidates are set out in an application pack, which interested candidates can access via a web-link in the advert. Candidates are short-listed against the criteria and then invited for interview with the most suitable candidate for a particular role selected by an appointments panel on the basis of the candidate's application and interview. The appointments panel for UKNHCC members normally consists of the UKNHCC Chair, the UKNHCC secretariat lead, a senior member of the PHE Diet, Obesity and Physical Activity Team, and an Independent Public Appointments Assessor obtained through the Office of the Commissioner for Public Appointments (OCPA).

The Chair and members are usually appointed for terms of two or three years in order to stagger appointment end dates. In accordance with the Code of Practice issued by the Commissioner for Public Appointments, there is a strong presumption that members cannot serve in one post for more than 10 years. However, members can reapply to serve on the committee through open competition.³ Members may be offered reappointment without the post being advertised up to the maximum 10-year term. This is desirable in order to retain expertise and experience on the committee. However, re-appointment of members is not automatic but subject to conditions including satisfactory appraisal and regular attendance at meetings.

Appointments of the Chair and members are made by the Senior Responsible Officer (SRO) at PHE.

Remuneration

Remuneration is taxable, and subject to National Insurance contributions, both of which will be deducted at source. Remuneration is not pensionable. Members may claim travel and subsistence expenses, which are properly and necessarily incurred in carrying out their role and responsibilities as a Member of the UKNHCC in line with travel and subsistence policy and rates for the UKNHCC (see Annex 1).

Time commitment

Members are contracted for up to 24 days per annum and would be expected to be available for up to 6 one-day meetings a year.

³ The Governance Code on Public Appointments

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/578498/governance_code_on_public_appointments_16_12_2016.pdf

Quorum

Due to the regulatory nature of the committee's work, a quorum of 5 members is required for the committee to finalise its opinions.

UKNHCC Member appraisals

Members are subject to a regular performance appraisal, to be carried out by the UKNHCC Chair and secretariat. Depending on the frequency of the UKNHCC's meetings, appraisals are carried out at least every two years in order that there is sufficient time between appraisals to enable significant discussion. Members' performance is monitored continuously between appraisals. The Chair is subject to an annual performance appraisal by the SRO.

Termination of appointments

Appointments may be suspended or terminated by PHE, without compensation, in the event that a member fails to fulfil his or her obligations or for conduct which renders the member unfit to remain in office. Any terminations must be agreed between the UKNHCC Chair, secretariat and SRO (as appropriate). Members may also resign from office, if they wish.

Personal liability and indemnity of committee members

As stipulated in the UKNHCC terms of appointment; members are protected from personal liability in respect of bona fide acts done in discharging functions on behalf of the UK Nutrition and Health Claims Committee and are indemnified in respect of expenses incurred in connection with claims in respect of such acts. A UKNHCC member may be personally liable if he or she makes a fraudulent statement which results in a loss to a third party; or may commit a breach of confidence under common law or criminal offence under insider dealing legislation; or if he or she misuses information gained through their position.

Role of members

Members are expected to abide by the "Seven Principles of Public Life" (sometimes referred to as the Nolan Principles), set out in the Cabinet Office Code of Conduct for Board Members of Public Bodies⁴ and at 'Annex 2' of this document. The principles of general conduct set out in that document, should also be borne in mind as good practice by UKNHCC members.

Members of the UKNHCC should ensure they understand why they are being appointed and in what capacity, and the role they are expected to play on the committee. Members should understand the nature of any expertise that they are asked to contribute. Members with a

⁴ The Cabinet Office Code of Conduct for Board Members of Public Bodies
<http://www.bl.uk/aboutus/governance/blboard/BoardCodeofPractice2011.pdf>

particular expertise have a responsibility to make the committee aware of the full range of opinion within the discipline. One or two members will independently review, assess and summarise the evidence submitted in support of each new claim application in order to facilitate a wider discussion by the full committee.

Members should confirm, before accepting an invitation to serve on the UKNHCC, that they are clear about the period of appointment and that they can fulfil the commitment required in terms of meeting attendance, committee business and preparation for meetings. These details are made known and discussed at the interview stage.

A member's role is not circumscribed by the expertise or perspective he or she was asked to bring to the UKNHCC. Members should regard themselves as free to question and comment on the information provided or the views expressed by any of the other members, notwithstanding that the views or information do not relate to their own area of expertise. If members believe the UKNHCC's method of working is not rigorous or thorough enough they are able to challenge methods either in open forum, through the Chair or by raising issues with the secretariat. All members have equal voice and the right to ask that any concerns be put on the record.

All members should regard it as part of their role to:

- ensure the UK government receive the highest quality, timely, advice
- examine the scientific evidence for substantiation of possible nutrition and health claims in light of the totality of evidence not just that provided by applicants
- summarise scientific arguments and draw conclusions on the validity of evidence for substantiation of possible nutrition and health claims
- adhere to the terms by which members are appointed to the UKNHCC, set out in the Code of Practice for Scientific Advisory Committees

All members should share in the general responsibility to consider the wider context in which their expertise is deployed. Members should not speak on behalf of the committee unless designated to do so. The spokesperson for the committee will normally be the Chair.

Role of the Chair

The role of the Chair goes further than simply chairing meetings. It is the key to achieving committee effectiveness and the additional workload should be taken into account in appointment of the UKNHCC Chair.

In addition to the responsibilities of a member, the Chair of the UKNHCC has responsibility for:

- the operation and output of the committee, including assessing the workload of members and ensuring that rigour of discussion is not compromised

- ensuring that the full range of scientific opinion, including unorthodox and contrary scientific views are appropriately taken into account
- ensuring that any significant diversity of opinion among the members of the committee is fully explored and discussed
- ensuring that every member of the committee has the opportunity to be heard and that no view is ignored or overlooked, using, where appropriate, a structured process which ensures that all views are captured and explored
- reporting the committee's advice to the 4 UK authorities
- representing the consensus opinions of the committee to the public or the media (unless other specific arrangements have been made)
- ensuring that the secretariat accurately documents the proceedings of the committee so that there is a clear audit trail showing how an opinion was reached
- keeping track of committee progress against the agreed timescales for response for the purposes of monitoring and evaluating the performance of the UKNHCC
- ensuring that the right balance of skills is represented in the UKNHCC membership
- ensuring that members have any necessary training to enable them to fulfil their role
- keeping track of individual members' performance in order to carry out members' appraisals with the UKNHCC secretariat

Role of the secretariat

The secretariat should be an impartial and disinterested reporter. It should at all times respect the UKNHCC's independent role. It should guard against introducing bias during the preparation of papers, during meetings, or in the reporting of the committee's deliberations. The secretariat should ensure that the proceedings of the UKNHCC are well documented so that there is a clear audit trail showing how the committee reached its conclusions.

The primary function of the secretariat is to support the UKNHCC by facilitating the work of members, ensuring documentation is correct and complete, recording conclusions of meetings and drafting and publishing the committee's opinions on a claim application. The secretariat must not be constrained by normal departmental interests and should be free to act independently in supporting the committee. It should advise members on relevant committee process and procedure. It should bring to the attention of the committee wider issues related to an application so as to inform the committee's deliberations. Issues of common interest with other government departments in the UK should be raised by officials in each department, either to the committee directly where they observe meetings in an official capacity, or via the secretariat in the case of all other government departments.

It is the responsibility of PHE, in discussion with the Chair, to provide secretariat support sufficient to enable the UKNHCC to fulfil its remit. The resource implications of appropriate secretariat support should be discussed with the UKNHCC Chair to ensure realistic expectations can be met. The secretariat should arrange regular briefing meetings with the Chair.

The secretariat should, as far as it is aware or able, identify all relevant scientific and policy information held by PHE, and ensure that it is made available to the UKNHCC as required. Consideration should be given to the necessary processes to ensure that policy leads and secretariats are able to effectively engage to this end.

Role of official observers

Departmental representatives and advisers attending meetings as official observers should at all times respect the UKNHCC's independence.

They should also ensure that their departments are promptly informed of any matters which may require a response from government departments in the UK, and equally, they should be given the opportunity to inform the committee of any science and policy matters which may be of relevance to the UKNHCC. Official observers should as far as they are aware or able, identify all relevant scientific and policy information held by their departments, and ensure that it is made available to the UKNHCC as required. In addition, there should be a permanent item on the agenda of UKNHCC meetings to allow for updates from official observers.

Openness, transparency and confidentiality

The UKNHCC is committed to the values of openness and transparency and recognises that they are fundamental principles, along with independence, which underpin public confidence in the scientific risk assessment process.

The UKNHCC's agendas and minutes are posted on the committee's website. The agenda is published approximately two weeks prior to a meeting. Official observers at UKNHCC's meetings have the opportunity to ask questions. The secretariat will aim to publish draft minutes of meetings within six weeks of the committee meetings, and final minutes are agreed at the following meeting, and then are published in place of the draft version. Scientific opinions on nutrition and health claim applications are published as quickly as possible and clearly set out the evidence on which the opinion is based and the reasons for concluding that a claim has been substantiated or not.

While committed to openness, there are circumstances under which confidentiality needs to be preserved. Examples include, but are not limited to:

- the need to protect commercially sensitive information in order to stimulate research and innovation within the food industry. This is recognised in the regulations underpinning the authorisation of nutrition and health claims which makes provision for the potential protection of proprietary data in the evaluation of a claim application.

- the need to protect the quality of the evaluation process to allow for free and frank discussions by independent scientific experts on potentially contentious issues and avoid the possibility of members' comments being taken out of context.
- the need to protect the public from potentially misleading information which could arise from the premature disclosure of the committee's discussions before conclusions have been drawn.

In view of these considerations, therefore, members of the UKNHCC assess the evidence and formulate draft conclusions on new nutrition and health claims applications in closed session. Members of the UKNHCC are also required not to disclose their discussions or any privileged information outside the context of UKNHCC meetings.

Handling Declarations of Interest

Definitions

Interest: An interest is an association or connection relevant to the work of the UKNHCC that may or may not influence a UKNHCC member's behaviour or judgement in the exercise of their public duties.

Declared interest: An interest, as defined above, of which the UKNHCC secretariat has been informed and/or which has been published in the UKNHCC annual report, as well as through other relevant reporting procedures.

Actual conflict of interest: Where an interest has the potential to conflict with the public duty of a UKNHCC member, to such an extent that a reasonable member of the public might question whether a member's behaviour or judgement could be/has been influenced by that association, this is explored in discussion with the UKNHCC secretariat, Chair and PHE Senior Responsible Officer (as appropriate). After the aforementioned discussion, any interest that is deemed to compromise a member's judgement on issues relating to the current UKNHCC work programme will be considered an actual conflict of interest and restrictions on the member's participation instigated.

Declaring interests

It is the duty of the UKNHCC secretariat to update and publish the annual register of committee members' interests. This is in accordance with the CoPSAC, "Secretariats should review and maintain such registers annually, publishing details as part of an annual report or similar routine progress update". In addition to annual publication, the UKNHCC secretariat will maintain a 'live' published register of interests, which will be updated as soon as possible after an interest is declared. A snapshot of the 'live' register of interests will be included in the annual report to act as a permanent record. Members are required to re-read this code of

practice document annually and should consult the UKNHCC secretariat if they require guidance.

On Appointment: Members must declare all their interests at the time of their appointment and must promptly notify the secretariat of any changes. New members should declare interests for a given year period for five years prior to the date of their appointment. These will be recorded in the UKNHCC Annual Report for the year of their appointment.

Oral Declaration of Interest: Before or at the start of every meeting members will be asked to declare any changes to their interests, which will be recorded in the minutes. It is the responsibility of each member to indicate if they have an interest in any item of business on the agenda of a meeting of the UKNHCC. In addition, where members declare an organisation's views rather than a personal view, they should make that clear at the time of declaring that view.

Annual Declaration of Interest: Members should declare all current interests, and any non-current interests will remain on the live published register of declarations of interest until they have been included in at least one UKNHCC annual report and therefore the permanent record.

Declarations should be of relevance to the work of the UKNHCC, and include associations with organisations directly related to the work of the UKNHCC and/or their competitors. Details should include: organisation name; nature of interest (e.g. consultancy / research funding); whether an honorarium/payment is received; details of the subject matter; and dates.

When populating the declaration of interest table at 'Annex 3', members should use the following as a guide:

Personal or family⁵ financial interest

Personal financial gain or financial gain to a family member through, for example:

- holding a directorship, or other paid position in an organisation related to the work of the UKHCC;
- carrying out consultancy or fee-paid work for an organisation related to the work of the UKNHCC;
- having shareholdings or other beneficial interests in a business related to the work of the UKNHCC;
- receiving expenses or hospitality to attend conferences or workshops or similar meetings related to the work of the UKNHCC, from any organisation other than their employer;

⁵ Spouse or partner and dependents

- receiving gifts with a value greater than £25⁶ (for personal interests only) from organisations related to the work of the UKNHCC; or
- receiving honoraria for meetings or similar, related to the work of the UKNHCC.

Members should declare any active or controlling role in an organisation related to the work of the UKNHCC and whether or not the cumulative total of all personal financial interests from a single body/source related to the work of the UKNHCC exceeds £5,000 per annum. Where the value of shares may fluctuate, the declaration should be made based on the situation as at 1st January each year. This declaration should be for the value of the shares alone, **not** the cumulative total of shares and any other financial benefit from the same organisation.

Members should declare the funding source of their salaries, should it be derived from an organisation other than their main employer if this connection could be construed as having the potential to influence their judgement in the exercise of their duties.

The holding of financial instruments such as a pension scheme would not be counted as a financial interest provided the member or family member has no influence on the management of the financial instrument.

Non-personal financial interest

Payment or other benefit to an organisation in which a member is employed, which is not received personally but is for work in which a member is directly involved or is directly responsible for, from a body relating to the work of the UKNHCC, including:

- a grant or fellowship or other payment to sponsor a post, or contribute to the running costs of the department;
- commissioning of research or other work, by a unit in which a member is employed;
- funding for, or other contributions to, research; or
- contracts with, or funding from, PHE.

Members should declare whether or not the cumulative total of all non-personal financial interests in a single body/source exceeds £5,000 per annum.

Members are not required to declare all relevant interests of their co-workers, it is only necessary to declare those in which a member is jointly involved or for which a member has oversight / responsibility.

⁶ Value taken from PHE's *Conflicts of interest policy and procedure*

Personal non-financial interest

This refers to a situation in which a member has acted in a way such that the public might reasonably believe that he or she may not consider evidence in a fair and unbiased manner. Examples include:

- active advocacy on behalf of an organisation with a strong opinion on a matter under consideration;
- other public or published statements expressing a clear opinion about a matter under consideration;
- holding office in a professional organisation, charity or advocacy group with a direct interest in a matter under consideration by the UKNHCC;
- authorship or co-authorship of a document used as evidence in a matter currently under consideration by the UKNHCC.

Considering that members are appointed on the basis of their scientific expertise on topics related to the work of the UKNHCC, it is expected that papers authored or co-authored by members will be used to inform the UKNHCC's opinions. It is not necessary to include a list of publications or articles in the register of interest, but where a member's paper is considered as part of an opinion, this should be highlighted in the minutes of the relevant discussion.

If a member has an interest not specified in these notes but which they believe should be declared, they should seek advice from the secretariat.

Information and context are vital to understanding declared interests, and communicating these will aid transparency and openness. A positive and useful way of doing this would be for members to feedback at meetings on aspects of their work outside of the UKNHCC, which appear on the register of interests.

Recognising potential conflicts of interest

It is unlikely that suitably qualified professionals are entirely unconnected or without interest in their area, and contributing to the work of the UKNHCC should not preclude members from presenting on their area of expertise, or restrict their ability to practise. The UKNHCC should encourage its members to involve themselves in discussions of the wider community, scientific or otherwise.

A conflict may arise where interests could be regarded as influencing members' advice, and it is the duty of the secretariat to consider the potential for conflict in members' declared interests. Some organisations have wide-ranging portfolios, which are not all of relevance to the UKNHCC, and an interest should not be deemed a conflict by name association alone. Instead, the secretariat should consider these potential conflicts in the context of a members' role and the subject matter of their involvement with an organisation or other body.

An interest is generally seen to have potential for conflict when the association relates to that of a current UKNHCC discussion item. A conflict is not deemed to exist simply on the basis of involvement with food companies, industry or other interested parties in general, but only where an actual conflict of interest exists. In addition, the secretariat must consider whether a member's role is such that they may be influenced by an organisation. For example, it is unlikely that a member would be influenced whilst presenting their own scientific opinion in open forum, with minimal compensation/honorarium.

There are interests other than direct interaction with commercial organisations, which have the potential for conflict. Academics on the UKNHCC and within the wider scientific community seek the majority of their research funds from public and Non-Government Organisations (NGO) sources, and have an interest in attracting work to their group. There is a potential conflict if the UKNHCC advice contradicts previous research findings or places less emphasis on the relevance of their research focus, as this might adversely affect the amount of research funding they are able to attract.

A potential conflict may also arise, where an expert has been vocal in expressing an opinion within the scientific community or wider media if the UKNHCC advice would contradict this view and possibly affect a member's scientific credibility. This refers to previously held opinions and the intent is not to inhibit a member's ability to practice and offer their professional opinion outside of the UKNHCC, but to ensure strong opinions do not affect the balance of the UKNHCC advice. The committee welcomes diverse opinion. It is particularly important to follow the UKNHCC's procedures for ensuring that its opinions reflect the considerations of the entire membership.

Members of the UKNHCC should not refer to or discuss, in public or private, an application under consideration until the committee's opinion is published. This does not, however, prevent members from discussing individual published papers which may also be within submitted dossiers.

Managing conflicts of interest

Full-time employment with a food industry company within the preceding year is incompatible with membership of the UKNHCC, as is consultancy providing advice to industry on the compilation of new claims submissions. Other conflicts of interest will be managed according to the degree of conflict.

Any concerns regarding members interests should in the first instance be discussed by the secretariat with the Chair, and where necessary, the views of the SRO or other senior officials in PHE sought. If an interest is deemed to have potential for conflict, discussions should be held between the member in question, the Chair, and the secretariat to gather further information and come to a decision on whether a conflict is present. Where a declared interest has been considered, this should be noted in the 'live' register of interests, along with the decision reached.

Where there is conflict, members will be asked to step down from their association or refrain from participation in discussions and drawing up of conclusions and opinions on related applications. It may be that the conflict is such that it would be impractical for a member to continue on the UKNHCC, if they would have to withdraw from a considerable amount of the UKNHCC's routine business. In such cases a member may be asked to stand down from the UKNHCC.

Where members carry out research projects funded by organisations with an interest in the work of the UKNHCC, the secretariat will seek further information and discussion to determine whether a conflict exists. Should the UKNHCC consider a paper authored or co-authored by a member submitted as evidence for an application, this should be borne in mind throughout deliberations and recorded in the minutes. If the paper constitutes a substantial part of a submission, members will be asked to refrain from participating in its assessment and the drawing of conclusions on the submission.

Members should withdraw from discussion of matters in which they feel they cannot act impartially.

Ultimately, decisions will be made by the UKNHCC Chair, secretariat and/or PHE SRO, as appropriate.

Maintaining independence

Where there is no clear conflict, the Chair and secretariat must stay mindful of interests and alert to the potential for bias and take appropriate steps to ensure this does not occur throughout the UKNHCC's discussions and the drawing of conclusions.

Officials within the secretariat are closely involved during the drafting of the UKNHCC opinions and evaluation of evidence; therefore, they should play an important part, along with members, in identifying possible bias throughout the deliberations of the UKNHCC. To support this task, the UKNHCC has procedures in place to ensure that its opinions reflect the considerations of the entire membership. These include:

- the use of agreed frameworks which set out criteria for consideration of different types of evidence, for example SACN's Framework for the Evaluation of Evidence⁷ and EFSA's scientific and technical guidance⁸
- oversight of the work and the deliberations of the UKNHCC by government officials from all UK countries
- the scrutiny of the UKNHCC chair

⁷ SACN/ UKNHCC framework for the evaluation of evidence

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/338009/SACN_Framework_for_the_Evaluation_of_Evidence_May_2012.pdf

⁸ <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2017.4680>

Annex 1: Travel and subsistence

Day subsistence: Period of absence	Rate (maximum actual receipted expenditure)
Five or more hours away	£5.00
Ten or more hours away	£10.00
More than twelve hours away and return after 7pm	£15.00

Overnight hotels and subsistence rates	
Maximum hotel cost (outside London)	£85.00
Maximum hotel cost (inside London)	£115.00
Evening meal allowance	£22.50

Mileage: standard rates for all engine sizes	
Car: on the first 10,000 business miles in the tax year	45p
Car: on each additional mile over 10,000 miles in the tax year	25p
Motor cycles	24p

Annex 2: The Seven Principles of Public Life (Nolan Principles)

Selflessness

Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other benefits for themselves, their family or their friends.

Integrity

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

Objectivity

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

Accountability

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness

Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership

Holders of public office should promote and support these principles by leadership and example.

Annex 3: Declarations of Interest pro forma

MEMBER	PERSONAL INTERESTS		NON-PERSONAL INTERESTS	
Member	Organisation	Details	Organisation	Details
Name	Company/organisation	<p>Nature of interest: (consultancy/shareholdings/other fee paid work/charity work/active advocacy);</p> <p>Financial: (yes/no), (honoraria received; shareholdings(Value of shares over £5,000: yes/no); travel or subsistence reimbursed etc) (Amount received per annum over £5,000: yes/no);</p> <p>Subject matter: (advising on X, Y, Z);</p> <p>Dates: (20XX to 20XX)</p>	Company/organisation	<p>Nature of interest: (research/grants/other funded work/fellowships/collaborations);</p> <p>Financial: (yes/no) (PhD student funding/research funding etc) (Amount received per annum over £5,000: yes/no);</p> <p>Subject matter: (research on effects of X on Y);</p> <p>Dates: (20XX to 20XX)</p>
First row only		Insert new row for each interest		