

CONFLICT OF INTEREST POLICY

SUPPORT-Meds: Supporting Health Professionals to Optimise Medicine Use

1. Purpose

All individuals involved in the SUPPORT-Meds program (the Program) are required to complete a Declaration of Interests Form; this includes all:

- Leadership Team members
- Health Professional Advisory Group members
- Consumer Advisory Group members
- Program Team members (Resource adaptation, Education development, Knowledge Broker, Program delivery, and Evaluation teams)
- Contracted Knowledge Brokers.

According to the National Health and Medical Research Council (NHMRC) [Disclosure of interests and management of conflict of interest - A guide](#), and under the *Australian Code for the Responsible Conduct of Research (2019)*:

'A conflict of interest (COI) exists in a situation where an independent observer might reasonably conclude that the professional actions of a person are or may be unduly influenced by the other interests. The perception that a COI exists can raise concerns about the integrity of the individuals or the management practices of the institution, potentially undermining community trust in research.'

2. Scope

This COI policy applies to all individuals contributing to decisions relating to the Program and delivery of the Program. It is a living document; updates and edits may occur during the Program.

2.1. Types of Conflict of Interests

Financial interests are foremost in the public mind, but other interests may also be relevant, including personal, familial, professional and organisational.

Financial interests requiring disclosure include but are not limited to:

- direct payment, such as salary or consultancy fees
- indirect payments, for example funding of travel or accommodation
- payments to support research, such as funding from an industry or interest group
- company shares or options
- royalties
- directorships
- some scholarships
- operational or infrastructure support.

Financial interests also exist where there is a future expectation of a benefit; for example, proceeds from the sale of intellectual property arising from a project or the promise of shares in a spin-off company.

Disclosure may also be required when a financial interest of the kind listed above is held by an immediate family member.

When considering financial interests, the COI Oversight Committee (comprising several Leadership Team members) will consider the significance of the financial interest, including:

- the monetary value of the payment, gift or interest
- whether payment was made to the individual directly, to their employer or to their immediate family
- significance that a reasonable, independent observer would attach to the payment gift or interest
- circumstances under which a gift or payment is made; for example, is the gift or payment a regular payment or single instance
- potential influence or bias an affiliation may have on program materials or activities.

Non-financial interests that require disclosure include but are not limited to:

- representation of, or a role/affiliation with, an organisation that could stand to benefit from or be affected by the Program (e.g. advocacy group, industry, industry-linked foundation)
- personal or social relationships and current and past professional relationships, where relevant
- recent employment with, or a role in, organisations with financial links or affiliations with industry groups that could stand to benefit from or be affected by the Program
- non-financial benefits (e.g. academic or social advancement).

This advice is based on the NHMRC's Disclosure of interests and management of conflict of interest: A guide supporting the Australian Code for the Responsible Conduct of Research.

3. Process of disclosure

All contributors to decisions relating to the Program and delivery of the Program are required to complete a Declaration of Interests form that is to be returned to the Research Manager before participating in the program.

- All actual, potential or perceived interests should be disclosed. Disclosure is required in relation to activities in the past 5 years and anticipated disbursements during the duration of the Program.
- It is the responsibility of individuals to continuously disclose any interest that is potentially a financial or non-financial COI. You must promptly inform the Research Manager if there are any changes during the course of the Program. Individuals will be reminded of the need to disclose and update their declaration of interest yearly.
- In line with NHMRC requirements, failure to disclose a relevant interest, or knowingly misleading the group regarding potential COIs, could lead to sanctions such as removal from the Program.

Completed Declaration of Interests Forms and management plans will be kept electronically by the Research Manager. A register of disclosed interests will be maintained by the Research Manager throughout the Program.

For contributors to decisions relating to the Program, conflicts of interest and corresponding management plans will be published when the Program materials are published.

4. Conflict of Interest identification

Completed Declaration of Interest Forms will be reviewed at the start of the Program, or at the time the individual becomes involved the Program, by the Research Manager and the COI Oversight Committee (comprising several Leadership Team members) to determine if any declared interests constitute a significant conflict.

Throughout the Program, individuals will be asked to review their declared interests and update them if necessary. Updated interests will be reviewed by the Research Manager and the COI Oversight Committee.

The potential for intellectual interests to become conflicts of interest may not be realised until meeting discussion or program involvement is underway; should this be the case, the interest must be declared immediately.

Individuals who are judged to have conflicts will be notified of the management plans (e.g. recuse from meeting, abstain from voting, abstain from specific program activities). Individuals who declare significant personal financial conflicts, and those with intellectual conflicts that are severe or cannot be adequately managed will be excluded from the Program.

5. Conflict of Interest management

It is possible that some individuals involved in the Program may have interests that could be perceived to be conflicts. When there are perceived conflicts, efforts will be made to balance the perspectives of these individuals. This includes:

- ensuring diversity of participants by selecting people with diverse perspectives, training and experiences
- giving participants the opportunity to independently vote or indicate their opinions on specific issues before and during the meeting or program activity.

The COI Oversight Committee will review all declarations and will determine appropriate management plans. A management plan will be developed by the COI Oversight Committee to determine the degree to which a member may participate in the Program. Management plan options include:

- restriction of involvement: exclusion from relevant discussion(s) (e.g. if a high conflict of interest exists)
- restriction of involvement: non-voting member and not involved in drafting content on relevant materials
- no restriction of involvement.

The Chairs should have no financial interactions with any pharmaceutical companies or other organisations identified to have a financial interest in the Program.

In the case of any disagreement about management plans, the plans will be reviewed by the Chairs.