

# COVID-19 Global Rheumatology Alliance Policy Document

Conflict of Interest Policy, Version 2.

Current as of 12:30 AEST 19-May-2020  
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## 1. Purpose

The purpose of this policy is to help the COVID-19 Global Rheumatology Alliance (C19-GRA) to effectively identify, disclose and manage any actual, potential or perceived conflicts of interest in order to protect the integrity of C19-GRA and manage risk.

## 2. Objective

The C19-GRA Steering Committee (called the 'committee' in this policy) aims to ensure that members covered by this policy are aware of their obligation to disclose any conflicts of interest and to comply with this policy to ensure they effectively manage those conflicts of interest.

## 3. Scope

This policy applies to the steering committee members of C19-GRA, members of sub-committees of the C19-GRA (specifically the Patient Board and the Clinical and Scientific Committee) and members of the C19-GRA who work on internal projects.

## 4. Definition of conflicts of interests

A conflict of interest occurs when personal interests compete with the responsibility to act in the best interests of the organisation. Due to the potential difference of opinions related to what may or may not be a conflict, this policy requires those who it covers to declare all paid and unpaid relationships, including clinical employment relationships and financial interests in medical, pharmaceutical and health insurance companies.

Personal interests include direct interests, as well as those of family, friends, or other organisations a person may be involved with or have an interest in (for example, as a shareholder). It also includes a conflict between a committee member's duty to C19-GRA and another duty that the committee member has (for example, to another organisation).

Representatives of organisations who also have significant conflicts should also consider declaring those.

It is important to note that a conflict of interest may be actual, potential or perceived and may be financial or non-financial.

These situations present the risk that a person will make a decision based on, or affected by, these influences, rather than in the best interests of the organisation.

Therefore, these situations must be managed accordingly.

## 5. Policy

This policy has been developed to address conflicts of interest affecting C19-GRA. Conflicts of interest are common, and they do not need to present a problem to the organization as long as they are openly and effectively managed. It is the policy of C19-GRA, as well as a responsibility of the committee, that ethical, legal, financial or other conflicts of interest be avoided and that any such conflicts (where they do arise) do not conflict with the obligations to C19-GRA.

C19-GRA will manage conflicts of interest by requiring committee members to:

- avoid conflicts of interest where possible
- identify and disclose any conflicts of interest through the designated mechanism
- carefully manage any conflicts of interest, and
- follow this policy and respond to any breaches.

### 5.1. Responsibility of the committee

The committee is responsible for:

- establishing a system for identifying, disclosing and managing conflicts of interest across the organisation
- monitoring compliance with this policy, and
- reviewing this policy on an annual basis to ensure that the policy is operating effectively.

The organisation must ensure that its committee members are aware of the good governance standards and that they disclose any actual or perceived material conflicts of interest.

### 5.2. Identification and disclosure of conflicts of interest

Once an actual, potential or perceived conflict of interest is identified, it must be entered into register of interests, as well as being raised with the committee. The register of interests must be maintained by each committee member advising of their competing interests. The register must record information related to a conflict of interest (including the nature and extent of the conflict of interest and any steps taken to address it).

### 5.3 Confidentiality of disclosures

The disclosures will be printed at the start of the agenda, and at the start of the official record of the meeting minutes.

## 6. Action required to manage conflicts of interest

### 6.1. Conflicts of interest of committee members

Once a conflict of interest has been appropriately disclosed, the committee (excluding the committee member who has made the disclosure, as well as any other conflicted committee member) must decide whether or not the conflict is relevant and whether those conflicted committee members should:

- vote on the matter (this is a minimum),
- participate in any debate, or

- be present in the room during the debate and the voting.

In exceptional circumstances, such as where a conflict is very significant or likely to prevent a committee member from regularly participating in discussions, consideration will be given to see if it is appropriate for the person conflicted to resign from the committee.

## 6.2. What should be considered when deciding what action to take

In deciding what approach to take, the committee will consider:

- whether the conflict needs to be avoided or simply documented
- whether the conflict will realistically impair the disclosing person's capacity to impartially participate in decision-making
- alternative options to avoid the conflict
- the organisations objects and resources, and
- the possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of, the organisation.

The approval of any action requires the agreement of at least a majority of the committee (excluding any conflicted committee member/s) who are present and voting at the meeting. The action and result of the voting will be recorded in the minutes of the meeting and in the register of interests.

## 7. Compliance with this policy

If the committee has a reason to believe that a person subject to the policy has failed to comply with it, it will investigate the circumstances. If it is found that this person has failed to disclose a conflict of interest, the committee may take action against them. This may include seeking to terminate their relationship with the organisation.

If a person suspects that a committee member has failed to disclose a conflict of interest, they must discuss this with the person concerned, discuss with the chair of the C19-GRA steering committee and/or notify the committee.

Contacts: For questions about this policy, contact the C19-GRA steering committee chair.

This policy has been written and approved by the C19-GRA Steering Committee, as at 12:30 AEST 19-May-2020.