Conflicts of interest - Policy

The NHMRC Act 1992 defines a conflict of interest as ‘any direct or indirect pecuniary or non-pecuniary interest’. A conflict of interest does not preclude an individual’s involvement within a particular group; however, to ensure the independence and integrity of decision-making processes and for transparency, all relevant interests must be declared and managed appropriately.

For further information on conflicts of interest, please visit the NHMRC ‘Guidelines for Guidelines’ website at https://www.nhmrc.gov.au/guidelinesforguidelines/plan/identifying-and-managing-conflicts-interest

1. Scope of COI policy

The Conflicts of Interest policy applies to all individuals who participate in the decision-making process as it relates to the development of guidelines within the National Taskforce for COVID-19 project. This includes but is not limited to: Members of the National Steering Committee, National Guideline Leadership Group, Expert Guideline Panel, National Executive Team and the Expert Methods Team, and peer reviewers.

2. The process of disclosing COIs

Any individual who participates in decision making processes relating to work undertaken within the project is required to complete a ‘Declaration of Interest’ form and return it to the project manager of the project either (a) prior to attending their first meeting (for members of committees, GDGs or other groups formed under the auspices of the project), or (b) either before or at the time of submission of comments/feedback in relation to a body of work (for example, peer reviewers). Members need to disclose all relevant interests within the previous five (5) years.

3. Identifying conflicts of interest

The completed ‘Declarations of Interest’ form for each member will be reviewed by the project manager and to determine if any entries within the form constitutes a conflict of interest. A Conflict Management Committee (CMC) will assess declarations if a potential conflict is indicated. The CMC will be comprised of individuals with expert knowledge of COI management. The chair of the CMC will make the final decision as to whether a conflict of interest requires the development of a management plan for that individual.

4. Management of conflicts of interest

Based on an assessment of members’ conflicts of interests, a judgement will be made regarding that members’ accepted level of participation within the guideline development group. A substantial conflict of interest, such as ongoing financial compensation by a private company with strong links to the topic of interest, will require that member to cease their involvement within the group; however one-off $500 honorarium from a company making products not related to the topic of the guideline may be permitted. Individuals who have specific conflicts as relates to defined sections within a guideline (e.g. the members’ spouse is employed by the manufacturer of a medical device that is the subject of a specific recommendation) may be required to leave the room and omit themselves from the decision making process for that topic.
Any disagreements by an individual flagged as having a conflict of interest that precludes their involvement within a decision-making process should be raised with the project manager. This will then be reviewed by the CMC and a decision made as to whether to uphold the decision to exclude the individual or overturn the decision and thereby allow the individual to participate in the decision-making process.

All declarations of interest and a description of how conflicts of interest were managed will be publicly available with the guideline.

5. As per NHMRC guidance, committee chairs should have no conflicts of interest and the majority (> 50%) of committee members should also be free of conflicts of interest.