Griffith University School of Medicine  

Conflict of Interest and Sponsorship Guidelines

Approving Authority: School of Medicine
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Purpose of the Guidelines:
The receipt of sponsorship/ gifts and/or benefits in tertiary education exists and can have positive and negative influences. The conflicts of interest that may be created by the acceptance of any sponsorship/gift or benefit are not necessarily wrong, however, they must be appropriately managed.

Conflict of interest occurs when there is a conflict between your obligations, duties, and/or purpose as a university employee, associate or student and your private interests\(^1\). Conflicts of interest may be actual, potential or perceived. These guidelines provide a decision making framework for Griffith University School of Medicine staff (full-time and part-time), students (undergraduate and postgraduate), academic title holders and external partners on how to maintain transparent, ethical relationships in the provision of health care education and related activities where any Gift, Benefit, Sponsorship, Hospitality or Service is offered and where a conflict of interest (actual, potential or perceived) may arise.

These guidelines apply to professional, educational and social activities undertaken in association with any Griffith Health programme or School, including activities undertaken by student associations which are identified as Griffith University events. They also apply to non-commercial research.

Commercial research contracts governed by the Consultancy and Commercial Research Policy (CCRP) are to be managed under the provisions of the CCRP.

Any activities undertaken by Griffith University staff must comply with the Code of Conduct.

Related Policies, Procedures and Forms:
- CMC Misconduct Prevention Advice Portal
- Code of Conduct Policy
- Consultancy and Commercial Research Policy
- FBT Taxation Policy
- Gifts and Benefits Policy
- Philanthropy and Fundraising policy
- Public Sector Ethics Act 1994
- Student Misconduct Policy
- Griffith University Code of Conduct Policy

Background

Griffith University School of Medicine aims to support students and staff to act as competent, ethically and socially aware health professionals who act with integrity, honesty and critical self-reflection. The aim of ensuring the best possible patient care within the highest functioning health care organisations lies at the core of our educational programmes.

\(^1\) Definition adapted from the CMC Guidelines on Conflict of Interest
Some evidence exists that exposure to industry partnerships in undergraduate health education may influence student attitudes and behaviours beyond graduation\(^2\). It is therefore important that university staff and students create and maintain a learning environment which is independent and free from bias, ensuring public interest is preserved within Griffith University Health Programmes and Schools.

**Principles**

In considering whether an actual, potential or perceived conflict of interest exists, the following four (4) principles should be considered:

1) **Educational/Academic Merit**
2) **Academic and Professional Independence**
3) **Equality of Access and Impartiality**
4) **Transparency and Accountability**

Prior to accepting any Gift/Benefit/Sponsorship/Hospitality or Service the proposal must be assessed with respect to the four principles.

1) **Educational/Academic Merit.**

Any Gift/Benefit/Sponsorship/Hospitality or Service accepted must be genuinely relevant to an educational, academic, research or wellbeing purpose related to a programme or school within the School of medicine. Core curriculum activities for the MBBS program will remain free from external sponsorship. If the Gift/Benefit/Sponsorship/Hospitality or Service does not meet this criterion it should not be accepted.

2) **Academic and Professional Independence**

Any Gift/Benefit/Sponsorship/Hospitality or Service should not be given with the intention to influence current or future behaviour of staff, students, individual School within the School of medicine, or the School of medicine as a whole. The preservation of academic and professional independence is a paramount consideration and should be made clear to potential sponsors.

The Griffith University Gifts and Benefits Policy states that “Any gift, service, benefit or sponsorship should not be accepted if the purpose is to obtain favours from the individual/group or place them under some obligation.” Staff and students are obliged to meet this requirement outlined in the Gifts and Benefits Policy.

3) **Equality of Access and Impartiality**

Preferential access to staff, students, or a preferential presence in programmes should not be given to any external partner as a result of providing any benefit or sponsorship. Staff and students within the Griffith School of Medicine will act with impartiality towards all external partners ensuring similar individuals, organisations or groups have similar opportunity to contribute to, and access, School of Medicine activities. Relationships with external partners will be founded on objective, independent, apolitical and impartial grounds.

4) **Transparency in Disclosure and Accountability**

The process of identifying, disclosing and managing conflicts of interest must be transparent, i.e. open to scrutiny, publicly disclosed and accountable.

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\(^2\) See bibliography
a) All Gift/Benefit/Sponsorship/Hospitality or Services which meet the four principles listed in these guidelines will be registered within each School’s COI register and endorsed by the School of Medicine Professional Practice Development Panel (see Appendix 1). The register will be updated monthly and be publicly accessible via the School of Medicine website.

b) All Gift/Benefit/Sponsorship/Hospitality or Services must be disclosed in accordance with the Griffith University Gift and Benefit Policy.

c) All staff, students and academic title holders must disclose any income or sponsorships received:

i) On their Griffith University staff profile page

ii) When they represent Griffith University in any public forum.

A COI disclosure will include the source and duration of current and past

- Research Funding
- Education/Wellbeing/Curriculum funding outside Griffith University
- Financial interests – Consultancy, Services, Equipment from outside bodies to support educational and research activities
- Professional positions;
  - Membership of committees of other organisations;
  - Consultancies;
  - Boards of Directors;
  - Advisory groups;

It is acknowledged that openness and peer review are the best protectors against the inappropriate management of conflicts of interest. Peer review is encouraged where uncertainty exists on the management of such situations. This may occur in conversation with colleagues and peers, by discussion in the various governance structures within the School of Medicine (for example, Theme Leads, Yr1&2, Yr3&4, or Education Committee), or by seeking feedback through the PPDP via the Chair (Theme Lead DLEPP).

Application

These four principles apply to any Gift/Benefit/Sponsorship/Hospitality/Service offered in relation to:

- Support for Curriculum Development.
- Educational and wellbeing activities indentified as Griffith University events (on and off Campus)
- Research – The University requires that all research must conform to the NHMRC Guidelines where conflicts of interest are declared under NS 2.19-2.21. These COI guidelines do not directly apply to research undertaken within the Commercialisation and Consultancy Research Policy (CCRP).
- Industry funded speaking relationships including compensation for travel
- Gifts including sponsorship and prizes
- Any financial relationships with an external partner
- Access to students or staff for educational and non-educational reason
- Sharing university information to an external partner
- Other circumstances where COI can arise

The Gift and Benefit Policy states:

“Any Gift/Benefit/Sponsorship/Hospitality/Service should not be accepted if the purpose is to obtain favours from the individual or group that is intended to place them under some obligation.”
Any Gift/Benefit/Sponsorship/Hospitality/Service is unacceptable if the giver’s aim is to influence the way an individual or group carries out their duties and induces them to act in a way that is contrary to the known rules of honesty and integrity.

Any Gift/Benefit/Sponsorship/Hospitality/Service/Other is acceptable if it is offered on the understanding that it does not place or appear to place any individual or group under any obligation and is not offered as a payment for anything that would normally occur as a University employee or student.

The flow chart below offers guidance on how to apply the 4 principles:
Flow Chart of Decision Making

Gift/Benefit/Sponsorship/Hospitality/Service offered

1. Is it relevant to an educational/academic/wellbeing/non-commercial research purpose related to the School of Medicine?
   - YES
   - NO

2. In accepting the Gift/Benefit/Sponsorship/Hospitality/Service is Academic and Professional Independence preserved?
   - YES
   - NO

3. Is equality of access to similar providers and impartiality of Griffith University maintained?
   - YES
   - NO

4. Does the donor of the Gift/Benefit/Sponsorship/Hospitality/Service agree to transparent disclosure?
   - YES
   - NO

Review steps 1 to 4. Can revisions be made?

1) Notify PPDP chair (Theme Lead DLEPP) for discussion and endorsement from PPDP.
2) Register with School of Medicine COI register (Appendix 1).
3) Where required, register the Gift, Benefit, Sponsorship, Hospitality, Service in accordance with the Gifts and Benefits Policy.

DECLINE OFFER

MONITOR AND REVIEW

Students
**EXAMPLES FOR DISCUSSION**

1. An academic is approached by a medical device company to trial a new piece of equipment in the clinical skills training laboratory. The equipment is worth $3000 and will be donated to the School at the end of the trial.

2. A health student organisation, who offer educational, wellbeing and social activities to student members, is offered financial sponsorship from a professional organisation. The sponsorship is for general activities and not linked to any specific event.

3. A health faculty is offered a range of branded products to equip a teaching area, a mock pharmacy. Only one brand of goods is supplied. The goods donated are worth approximately $2000.

4. An academic title holder is offered travel and accommodation expenses (worth approximately $5000) to present a paper on the efficacy of a branded drug which has been part of a clinical trial in which the academic was a researcher. The academic mentions the research in lectures and promotes the branded product.

5. A student organisation runs a family friendly event on a weekend to encourage student wellbeing and networking for students with families. Events planned include a BBQ, face painting, jumping castle and games. The student organisation funds this event through sponsorship. Part of the commercial relationship between the student organisation and the sponsors is that the student organisation places the sponsors’ name on all promotional material.
Definitions

‘External partners’ may include the pharmaceutical industry, the medical device and technology industry, health care product and service suppliers, and other individuals or professional organisations.

“Conflict of interest” – a conflict between your obligations, duties, and/or purpose as a university employee or student and your private interests are in conflict.

An actual conflict of interest – where a real conflict exists between your obligations, duties, and/or purpose as a university employee or student and your private interests.

A potential conflict of interest - where a conflict may exist between your obligations, duties, and/or purpose as a university employee or student and your private interests.

A perceived conflict of interest – where a 3rd party could form the view that your private interests could improperly influence your actions as a university employee or student now or in the future. Conflict may exist between your obligations, duties, and/or purpose as a university employee or student and your private interests.
Appendix 1

CONFLICT OF INTEREST REGISTER

SCHOOL OF MEDICINE

<table>
<thead>
<tr>
<th>Date received</th>
<th>Description and intended purpose of Gift/Benefit/Sponsorship/ Hospitality/Service received.</th>
<th>Value $</th>
<th>Name of donor</th>
<th>Received benefits retained by:</th>
<th>Date of PPPD Endorsement</th>
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Appendix 2 – Disclosure

Example 1

Staff Profile Disclosures should include the source and duration of current and past

- Research Funding
- Education/Wellbeing/Curriculum funding outside Griffith University
- Financial interests – Consultancy, Services, Equipment from outside bodies to support educational and research activities
- Professional positions;
  - Membership of committees of other organisations;
  - Consultancies;
  - Boards of Directors;
  - Advisory groups;

Example 2

GUMS Disclosure of a medical defence organisation sponsorship of an evening medico/legal lecture as professional development.

<table>
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<tr>
<th>Date received</th>
<th>Description and intended purpose of Gift/Benefit/Sponsorship/ Hospitality/Service received.</th>
<th>Value</th>
<th>Name of donor</th>
<th>Received benefits retained by:</th>
<th>Date of PPPD Endorsement</th>
</tr>
</thead>
<tbody>
<tr>
<td>24th July 20XX</td>
<td>BMD will provide a speaker and catering for professional lecture covering issues of negligence in health care. The lectures are intended for MBBS students. This topic is part of the MBBS curriculum. Academic independence of the SoM is assured. Other medical defence organisations are invited to contribute to future seminars. BMD agrees to disclosure.</td>
<td>$250</td>
<td>BEST MEDICAL DEFENCE (BMD)</td>
<td>Mr Joe Bloggs - Academic Rep on behalf of GUMS</td>
<td>30th JULY 20XX</td>
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</table>

Example 3 – Power point slide – When representing Griffith University

Name:

Organisation: Griffith University

COI Declaration

- Not employed or reimbursed by PI
- Not a member of advisory group or engaged as a consultant for PI or EBM
- Receive no travel or academic support from the PI or any related company
- Not a shareholder of any PI
- Do not produce XXX resources
- Contribute to enrolling patients onto clinical trials sponsored by Roche, Pfizer, Cellgene, CSL and Amgen
**Appendix 3**

**Additional Resources**

**Gifts and benefits Policy**

**1.0 Definition**

**Gifts and benefits** are defined as any item of value, including goods, services or hospitality received by a member of the University, as a consequence of their employment at the University, other than those received from the University as part of their employment terms. Gifts received by staff while overseas on University business and gifts received by staff from international visitors that are not retained and displayed on University premises are covered by this Policy. Gifts and benefits may be reportable or non-reportable.

**Reportable** ones are those that should be registered because there is either a requirement or an expectation that they be registered (to meet legislative requirements of the Financial Management Standard 1997).

**Non-reportable** ones are those that don’t have to be reported and included in a gift register.

**Prizes and Awards Policy and Procedures**

**1.1 Accepting Prize and Award Funds**

Funds may be accepted from outside bodies for the purpose of establishing prizes (including scholarships and other awards). In accepting funds for this purpose, consideration will be given to whether the sponsor of the prize or scholarship has a positive public image with which the University wishes to be associated.

Authority is delegated by Council to the Chair of Academic Committee to accept such monies on behalf of the University and to establish or disestablish, in consultation with the School, Faculty or College concerned, rules for awarding prizes (including scholarships and other awards).

The status of the University Medal as the premium award for academic excellence should be retained.

**Griffith University Code of Conduct**

**Working with Integrity**

Staff are placed in a position of trust. Staff are to maintain and enhance public confidence in the integrity of the University and advance the University’s common good. Staff should not improperly use their official powers or position or allow them to be improperly used. Any conflict that may arise between a staff’s personal interest and official duty should be resolved in favour of public interest.

<table>
<thead>
<tr>
<th>You will:</th>
<th>You will not:</th>
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<tbody>
<tr>
<td>Declare potential conflicts of interest between your private and/or financial interests and University responsibilities.</td>
<td>Accept any gifts or benefits in connection with the performance of your duties except for the occasional gift of up to $150 in value.</td>
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<td>Declare your relationship when participating in decisions affecting another person with whom you have a personal relationship.</td>
<td>Conduct research in a manner that would compromise intellectual honesty and public interest.</td>
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<tr>
<td>What happens if I don't work within the Code?</td>
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<td>---------------------------------------------</td>
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<tr>
<td>While the Code's purpose is educative, it also acts to regulate behaviour. Staff whose conduct falls below the standards outlined in the Code will be counseled in accordance with the appropriate University policy. Significant departures from the standards of conduct in the Code may amount to misconduct on the part of the staff member and the University may discipline you in accordance with the University's disciplinary procedures.</td>
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<table>
<thead>
<tr>
<th>Consultancy and commercial research policy</th>
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<tr>
<td>3. Guiding Principles</td>
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<tr>
<td>All Consultancy &amp; Commercial Research (CCR) Project Work as described in this policy is governed by the following guiding principles:</td>
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<td>e) Consultancy &amp; Commercial Research (CCR) Project Work must not be in conflict with University policies governing employment; e.g. (i) Code of Conduct (particularly the sections relating to 'working with integrity' and 'working with resources'), (ii) Preserving Professional Relationships, (iii) Conflict of Interest, and (iv) Ethical Behaviour.</td>
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<tr>
<td>f) The Consultancy &amp; Commercial Research (CCR) Project Work must not be in conflict with the statutory functions, objectives or aims of the University, or damage the University's reputation.</td>
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<tr>
<td>g) The Consultancy &amp; Commercial Research (CCR) Project Work must not compromise the University's obligations under (i) various legislative frameworks (be those Commonwealth, State, local) including refraining from anti-competitive practices; and (ii) existing contracts.</td>
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<th>Student misconduct</th>
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<td>1.0  Misconduct</td>
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</table>
2.1 A student who, without reasonable cause –

2.1.1 breaches any statute or University rule;

2.1.7 discloses confidential information concerning any matter relating to the University;

2.1.14 breaches any University policy including, but not limited to, those concerning harassment and discrimination, privacy, intellectual property, occupational health and safety, use of the library, computers, computer facilities, information technology and information technology facilities and use of or access to University sites; or

2.1.15 breaches any Act of the Commonwealth or of the State of Queensland to which the University is subject, while in or on a University site or using University services or facilities; is guilty of misconduct.

2.2 This policy applies to all misconduct committed by a student in or on a University site or by using University services or facilities, whether or not in connection with an academic programme, or if committed otherwise than on a University site or by using University services or facilities, committed while performing tasks as part of an academic programme.

2) The **ethics principles** are—

- Integrity and impartiality
- Promoting the public good
- Commitment to the system of government
- Accountability and transparency.

**6 Integrity and impartiality**

In recognition that public office involves a public trust, public service agencies, public sector entities and public officials seek to promote public confidence in the integrity of the public sector and

(a) are committed to the highest ethical standards; and

(b) accept and value their duty to provide advice which is objective, independent, apolitical and impartial; and

(c) show respect towards all persons, including employees, clients and the general public; and

(d) acknowledge the primacy of the public interest and undertake that any conflict of interest issue will be resolved or appropriately managed in favour of the public interest; and

(e) are committed to honest, fair and respectful engagement with the community.
Bibliography


Komesaroff, P. and Kerridge I.H. (2002). Ethical issues concerning the relationship between medical practitioners and the pharmaceutical industry. MJA. 176:118-121.


Victorian Public Sector Conflict of Interest Framework