



Global Obesity Centre (GLOBE) Conflict of Interest Guidelines

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Introduction

The Global Obesity Centre (GLOBE) is a research group based in the Institute for Health Transformation (IHT), in the Faculty of Health at Deakin University. GLOBE is a designated World Health Organization (WHO) Collaborating Centre for Obesity Prevention. The vision of GLOBE is to catalyse improvements in population health, with a focus on obesity, through innovative research that empowers people and enables healthier environments.

This document sets out guidelines for GLOBE members (including staff and affiliated students) in relation to declaring and managing conflict of interest (COI) when carrying out activities in pursuit of the GLOBE vision. GLOBE members are advised to consider the guidelines presented in this document prior to and during the course of engagement with a party external to GLOBE, including commercial entities, non-government organisations (NGOs), government agencies and other researchers (both at Deakin University and externally).

The guidelines presented in this document are to be applied in conjunction with general guidelines and codes of conduct for undertaking research in Australia and at Deakin University specifically (refer to Appendix 1), and the guidelines¹ that govern the types of engagements that GLOBE is able to enter into through its designation as a WHO Collaborating Centre.

The guidelines were developed based on the WHO Guidelines for managing COI in relation to nutrition programmes,² and the World Obesity Federation Financial Relationship Policy,³ with modifications to the specific goals and context of GLOBE. It is envisaged that the GLOBE COI Guidelines will be reviewed every 12 months.

¹ <http://www.who.int/collaboratingcentres/information/en/>

² <https://www.who.int/nutrition/consultation-doi/comments/en/>

³ <https://www.worldobesity.org/resources/resource-library/financial-relationship-policy>

Definition of conflict of interest

For the purposes of these Guidelines, a broad conceptualisation of COI is taken. The Guidelines are designed to cover perceived, potential and actual COI, at both the institutional and individual levels:

- An institutional COI describes a situation in which the interests of an institution or an employee of the institution, acting within his or her authority on behalf of the institution, may affect or appear to affect the activities of the institution. Institutional COI is of particular concern when financial interests create the potential for inappropriate influence over the institution's activities.⁴
- An individual COI level, in this research context, refers to situations in which financial or other personal considerations may compromise or appear to compromise the integrity of the research and/or the reporting of the research.⁵

Process for assessing and managing potential conflict of interest

GLOBE members need to consider COI at all stages of the research process, including initial conceptualisation of ideas and collaborations, through to dissemination and knowledge exchange.

GLOBE has established a COI Committee to provide guidance to GLOBE members regarding the identification of COI and ways to manage COI when engaging with parties external to GLOBE. The COI Committee should be consulted as early as possible in the process of engaging with parties external to GLOBE. Importantly, final decisions regarding engagement with parties external to GLOBE are made by individual researchers, with reference to these Guidelines and in consultation with the Director/s of GLOBE, not by the GLOBE COI Committee.

The COI Committee should comprise a minimum of three senior researchers (Level C or above) within GLOBE, including a mix of genders if possible. For committee meetings to assess a particular engagement, individual researchers involved in the engagement under consideration should be invited to attend the meetings to provide any necessary clarifications and details. Where a member of the COI Committee is directly involved (e.g., a Chief or Associate Investigator) in the engagement under discussion, they should not be part of the relevant COI Committee, but may participate in discussions in the meeting. If the GLOBE Director is directly involved in the engagement under discussion, final decisions regarding COI should be referred to the Director of IHT, the Head of the School of Health and Social Development (HSD) or the Dean of the Faculty of Health (as appropriate).

⁴ Definition adapted from:

https://medschool.duke.edu/sites/medschool.duke.edu/files/field/attachments/icoi_implementation_document.pdf

⁵ Definition adapted from:

<https://ori.hhs.gov/education/products/ucla/chapter4/default.htm>

When GLOBE and/or GLOBE members propose to engage with parties external to GLOBE, a risk/benefit assessment (refer to Appendix 2) of the potential relationship should be conducted. The risk/benefit assessment process should consider the potential benefits of the engagement, and weigh these up against the potential risks to GLOBE and the individual researchers involved.

The risk/benefit assessment should consider:

- a) The characteristics of the organisation and affiliations/relationships of the party with whom GLOBE is considering an engagement.
- b) The type of engagement that might be entered into and the potential benefits and risks to the reputation of individual researchers, GLOBE, IHT and, more widely, Deakin University.
- c) The extent to which engagement is necessary to meet the desired goals of the engagement.

Based on the outcomes of the risk/benefit assessment, decisions should be made about whether to proceed with the engagement and the risk management processes that need to be put in place. For ongoing engagements, the risk/benefit assessment should be repeated once the nature of the engagement has been determined and approximately every 12 months.

Characteristics of the external party

Table 1 classifies external organisations into four tiers, based on the associated COI risks to GLOBE. The classification structure is based on a range of factors, including alignment to public health goals, potential risks to GLOBE, and the nature of the research conducted by GLOBE. The categories should be kept under review and may change over time. Where an individual researcher is in doubt about the category in which an organisation should be classified, the GLOBE COI Committee can provide guidance.

Table 1. Classification of external organisations for COI purposes

Tier	Characteristics of external organisation
Tier 1	<ul style="list-style-type: none"> • The tobacco industry, including: companies directly engaged in the production, manufacture, distribution, and selling of tobacco or tobacco products (including e-cigarettes) ⁶ • The alcohol industry, including: companies directly engaged in the production, manufacture, distribution, and selling of alcohol products ⁷ • The gambling industry • The weapons/armaments industry • Political parties • Industries substantially involved in illegal activities • NGOs (e.g., philanthropic organisations, community groups, think tanks) that receive a substantial degree (e.g., more than 10%) of their revenue/funding from or that have substantial links (e.g. through governance arrangements, registered lobbyist) to any of the above-mentioned sources
Tier 2	<ul style="list-style-type: none"> • Food and non-alcoholic beverage manufacturers (including related associations and peak bodies), excluding those focused exclusively on fruit and vegetable products • Food service providers (including quick service restaurants, cafés, full-service restaurants and caterers – as well as related associations and peak bodies), excluding those focused exclusively on fruit and vegetable products and/or where food provision is not the primary purpose of the organisation • Supermarkets and general food retailers (including related associations and peak bodies) • Food distributors (including food importers, exporters, aggregators and online food delivery), excluding those focused exclusively on fruit and vegetable products • Food growers and the agricultural industry (including related associations and peak bodies) • The pharmaceutical industry, including manufacturers or retailers of pharmaceuticals or medical equipment • Producers of weight management and/or weight loss services and products (including meal replacement products) • NGOs (e.g., philanthropic organisations, community groups, think tanks) that receive a substantial degree (e.g., more than 10%) of their revenue/funding from, or that have substantial links (e.g. through governance arrangements, registered lobbyist), to any of the above-mentioned sources

⁶ Supermarkets and other general retailers that sell tobacco products as part of a much broader product range are not included here

⁷ Supermarkets and other general retailers that sell alcohol as part of a much broader product range are not included here

Tier 3	<ul style="list-style-type: none"> • Food manufacturers, distributors and retailers focused exclusively on fruit and vegetable products • Private health service providers, health insurance companies • Sport and fitness clubs, and sporting goods manufacturers • Automobile industry, road building industry, automobile fuel companies • Property development companies • NGOs (e.g., philanthropic organisations, community groups, think tanks) that receive a substantial degree (e.g., more than 10%) of their revenue/funding from or that have substantial links (e.g. through governance arrangements, registered lobbyist) to any of the above-mentioned sources
Tier 4	<ul style="list-style-type: none"> • Government departments, public authorities and government agencies • Universities and research institutes • Other NGOs, professional associations, private sector organisations and philanthropic organisations not included in other tiers

Engagement type

Potential opportunities for GLOBE’s engagement with external parties can be classified into four categories, based on the extent of engagement and their relationship to core activities of GLOBE:

- High risk (engagements involving funding for research and/or GLOBE initiatives, or substantial in-kind contributions)
- Medium risk (funding for attendance at meetings, and smaller in-kind contributions)
- Low risk (minor engagements, such as joint authorship and other formal collaborations)
- Minimal risk (other activities with external parties, such as attending meetings hosted by the organisation)

The categories are kept under review and may change over time.

Risk assessment matrix

The risk assessment and associated recommended actions are based on the engagement type and the classification of the external party (see Table 2).

Table 2. Risk matrix guiding actions required for GLOBE engagement

Type of engagement	Classification of external party (see Table 1)			
	Tier 1	Tier 2	Tier 3	Tier 4
High risk <ul style="list-style-type: none"> - Financial contribution to a research project or GLOBE initiative - Substantial (e.g. >\$1,000) in-kind contribution to a research project or GLOBE initiative (including provision of data and/or resources, meeting rooms) 	Do not engage	Prepare risk/benefit assessment (Appendix 2) and refer to GLOBE COI Committee for assessment, approval needed from GLOBE Director (or equivalent) ⁸	Prepare risk/benefit assessment (Appendix 2) for approval by GLOBE Director (or equivalent) who can seek advice from or delegate to GLOBE COI Committee	No approval required, but individuals to be aware of COI
Medium risk <ul style="list-style-type: none"> - Financial contribution for a GLOBE member to attend a meeting or event, including honoraria or gifts - Minimal (e.g. <\$1,000) in-kind contribution to a research project or GLOBE initiative 	Do not engage	Prepare risk/benefit assessment (Appendix 2) and refer to GLOBE COI Committee for assessment, approval needed from GLOBE Director (or equivalent)	No approval required, but individuals to be aware of COI	
Low risk <ul style="list-style-type: none"> - Joint authorship of an academic paper / report with a representative of the organisation - Engage in formal dialogue with a 	Prepare risk/benefit assessment (Appendix 2) and refer to GLOBE COI Committee for assessment,	Prepare risk/benefit assessment (Appendix 2) for approval by GLOBE Director (or equivalent) who can seek advice from or	No approval required, but individuals to be aware of potential COI	

⁸ It is likely to require only a very special set of circumstances and very strong potential benefits in order for the GLOBE COI Committee to endorse a financial contribution from a Tier 2 party

<p>representative of the organisation</p> <ul style="list-style-type: none"> - Other formal collaborations e.g., joint positions on a committee or think tank, joint submissions to enquiries 	<p>approval needed from GLOBE Director (or equivalent)</p>	<p>delegate to GLOBE COI Committee</p>	
<p>Minimal risk</p> <ul style="list-style-type: none"> - Joint authorship of an academic paper / report with an individual (e.g. a researcher) that has accepted funding, published with, or has other substantial past or present associations with Tier 1 and 2 organisations - Attend a meeting or event hosted by the organisation 	<p>Prepare risk/benefit assessment (Appendix 2) for approval by GLOBE Director (or equivalent) who can seek advice from or delegate to GLOBE COI Committee</p>	<p>Prepare risk/benefit assessment (Appendix 2) for own records, no approval required</p>	<p>Individuals to be aware of potential COI, no approval required</p>

Sample risk management strategies

A range of risk management strategies can be adopted to manage risks associated with COI.

At a broad level, GLOBE will manage risk by:

- Publishing a list of all funding sources for GLOBE projects and initiatives
- Publishing a list of all partners (including organisations that have made 'in-kind' contributions) for GLOBE project and initiatives
- Publishing details of all decisions made by the GLOBE COI Committee, and case studies of risk/benefit assessments referred to the GLOBE COI Committee
- Adopting strong quality control processes (including internal and external peer review, as appropriate) with respect to research conducted
- Regular meetings with GLOBE Directors / COI Committee to monitor engagement and COI

In regards to specific engagements, strategies may include:

- Governance processes that ensure research independence as part of collaborative projects
- A decision not to accept financial contributions for a particular engagement
- Transparent Memorandums of Understanding (MOUs) with any partner organisations that highlight the need for research integrity in all aspects of engagement, including research design, analysis and dissemination
- Full disclosure and transparency of funding arrangements and potential COI as part of publications/presentations

Appendix 1: Relevant Deakin University Guidelines

Deakin University has a Conflicts of Interest Procedure, available here: [Conflicts of Interest Procedure](#).

Deakin University also has a [Research Conduct Policy](#), that is based on the [Australian Code for the Responsible Conduct of Research](#). The Australian Code for Responsible Research is jointly issued by the National Medical and Research Council, the Australian Research Council and Universities Australia and outlines general principles and practices for institutions and researchers to engage in responsible research.

[Deakin University’s Research Conduct Policy](#) covers principles around: Social Responsibility, Research Integrity, Health and Safety in Research, Management of Research Data and Primary Materials, Supervisors and Research Students, Publication and Dissemination of Research, Authorship, Peer Review, Conflicts of Interests, Collaborative Research, Conscientious Objection, Research Code Breach and Serious Research Code Breach. Key highlights of the document relating to Social Responsibility and the External Relationships Policy are presented in Table A1.

Table A1. Extracts from Deakin University’s Research Conduct Policy and External Relationships Policy

<p>Social Responsibility</p>	<ul style="list-style-type: none"> • The University will not accept funding for research from, or enter into any partnership or other arrangements with organisations as proscribed in the External Relationships policy. • The University will not engage in research that leads to the proliferation of conventional weapons, weapons of mass destruction and acts of terrorism and will comply with the Defence Trade Controls Act (Cwth) 2012, as well as the United Nations Security Council and Australian Government sanctions under the Charter of the United Nations Act (Cwth) 1945. • The University will not engage in financial transactions with and/or supply military or strategic goods and services (including technology transfer, technical assistance or advice and 'dual use of research of concern' goods) to a sanctioned country or designated person and will comply with the Autonomous Sanctions Act (Cwth) 2011.
<p>External Relationships Policy</p>	<p>Deakin University also has an External Relationships Policy which “defines the parameters by which the University may engage in relationships, partnerships or other arrangements with external parties aimed at advancing the strategic endeavour of the University.”</p>

	<p>The University values partnerships and other arrangements with external bodies that deliver tangible outcomes to all parties and that are in line with their strategic goals provided that they do not compromise the integrity or reputation of the University.</p> <p>(5) The University may enter into relationships with parties in Australia and internationally as a means of furthering its mission and core commitments and to achieve its strategic goals.</p> <p>(6) Such relationships may be instigated by any party and may entail the disbursement as well as receipt of funds or in-kind benefits by the University.</p> <p>(7) Any external relationship must be consistent with external and University legislation and the policies and procedures guiding such issues as intellectual property, conflicts of interest and fraud.</p> <p><i>Proscribed Relationships</i></p> <p><u>(8) Except with the written permission of the Vice-Chancellor, the University will not accept funding from, or enter into any partnership or other arrangement with organisations with a vested interest in limiting measures to mitigate harmful social or health impacts of their products.</u></p> <p>(9) The University will not accept funding from:</p> <ol style="list-style-type: none"> a. the tobacco industry, including: <ol style="list-style-type: none"> i. companies directly engaged in the production, manufacture, distribution, promotion or marketing of tobacco or tobacco products as their primary business b. foundations primarily funded by the tobacco industry c. the gambling industry. <p>(10) Funding from the alcohol industry or related industries will be considered on a case-by-case basis and may only proceed with the written approval of the Deputy Vice-Chancellor Global Engagement and input from other relevant Executive members as required. Approval must be obtained prior to submission of a proposal funded by those industries.</p> <p>(11) On the advice of the Vice-Chancellor, Council may add to or delete organisations and industries from the above list of proscribed relationships.</p> <p>(12) The Vice-Chancellor will not grant the permission referred to in clause 8 unless they is satisfied that acceptance of the funding or entering into the partnership or other arrangement will not compromise the integrity or reputation of the University.</p> <p>(13) If the Vice-Chancellor grants the permission referred to in clause 8, they must advise the University Council of this at its next meeting, setting out the reasons for concluding that accepting the funding or entering into the partnership or other arrangement will not compromise the integrity or reputation of the University.</p>
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Appendix 2: Risk/benefit assessment template

Project/engagement title	
Nature of proposed/existing engagement	
GLOBE members involved	
Name of other party/parties involved	
Key activities of the external party/parties	
Funders/revenue sources of the external party/parties (if applicable)	
Core values / strategic goals of the external party/parties, and degree of alignment with public health goals and GLOBE's vision	
Proposed benefits	
Potential risks	
Risk management strategies in place or proposed	
Other considerations	