



Disclosure of interests and management of conflicts of interest

A guide supporting *The Aurum Project Code for the Responsible Conduct of Research*

The Aurum Project

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The Aurum Project acknowledges and has adapted *Disclosure of interests and management of conflicts of interest: A guide supporting the Australian Code for the Responsible Conduct of Research*. National Health and Medical Research Council, Australian Research Council and Universities Australia. Commonwealth of Australia, Canberra

Source: *National Health and Medical Research Council*.

1. Introduction

This guide supports the *Aurum Project Code for the Responsible Conduct of Research* (the AP Code), which describes the principles and responsibilities that underpin the responsible conduct of Aurum Project (AP) research.

This guide aims to facilitate the disclosure of interests and the identification and management of conflicts of interest in order to:

- maintain the integrity and reliability of the conduct and outcomes of research
- mitigate the risks associated with the complex relationships between researchers and public and private organisations
- ensure public trust in individuals and organisations involved in research.

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This guide also aims to assist those involved in research to understand and apply best practice in disclosing interests and in managing any conflicts that may arise, or may be perceived to arise, from those interests.

The AP Code and this guide apply to all research conducted under the auspices of the Aurum Project.

2. Disclosure of interests

2.1 What interests should be disclosed?

The AP Code requires researchers to disclose all interests that are relevant, or could appear to be relevant, to proposed or ongoing research. Where required, relevant interests may also need to be disclosed to funding bodies, research participants, publishers and journal editors, collaborators and the public.

Institutions may also have interests that are relevant to individual research projects or research programs that may merit disclosure to researchers, funding bodies, research participants, publishers and journal editors, collaborating institutions or the public.

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 payments to the researcher, such as salary, consultancy payments, speaking fees, panel memberships
- indirect payments to the researcher, for example funding of travel, accommodation, professional development, hospitality
- 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.

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

When disclosing financial interests, researchers and institutions should consider the significance of the financial interest, including:

- the monetary value of the payment, gift, or interest
- the significance that a reasonable, independent observer would attach to the payment, gift or interest
- the circumstances under which a gift or payment is made, for example, if the gift or payment is a regular payment or a single instance.

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

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- board membership (even if unpaid) or other affiliation with an organisation that could stand to benefit from or be affected by the research
- personal or social relationships and current and past professional relationships, where relevant
- recent employment with, or role in, organisations with financial links or affiliations with industry groups that could stand to benefit from or be affected by the research.

2.2 What is a conflict of interest?

Under the AP Code, a conflict of interest 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 other interests. The perception that a conflict of interest exists is a serious matter and can raise concerns about the integrity of individuals or the management practices of the institution, potentially undermining community trust in research.

The design and conduct of research often requires consultation or expert advice. Particularly in Australia, the pool of experts in a research field can be so small that all the relevant individuals from whom a researcher might seek advice or guidance have some link with the design, sponsorship or conduct of the research project or with related research projects. Whether these activities or relationships give rise to a conflict of interest is a determination to be made by the appropriate decision maker.

In making this determination, it should be recognised that having multiple interests does not necessarily constitute a conflict of interest.

2.3 Identifying and managing conflicts of interest

Having a conflict of interest does not, in itself, imply improper motivation or individual wrongdoing. However, it is important that any conflict of interest is properly identified and managed. After an individual discloses their interests, an appropriate decision maker (e.g. an authorised institutional officer, a committee Chair, or a committee) must determine whether a conflict of interest exists.

If a conflict of interest is identified, the appropriate decision maker must determine what measures, if any, are most appropriate to manage that conflict of interest. These measures should be tailored to the individual circumstances and could include one or more of the following:

- requiring the public disclosure of the interests, for example when presenting or publishing the research
- involving an appropriate individual to oversee some or all of the research activity
- requiring the researcher to absent themselves from any deliberative decision making regarding the research
- requiring the researcher to play a different or reduced role in some or all of the research
- requiring the researcher to relinquish financial or other interests.

3. Responsibilities of The Aurum Project

This section provides guidance on the responsibilities that The Aurum Project has in relation to disclosure of interests and identification and management of conflicts of interest.

3.1 Develop and promote AP policy

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AP must make this policy accessible to all staff, researchers and other interested parties, including the public and should:

- require that researchers disclose all relevant interests to the AP
- guide those involved in research in making appropriate disclosures of relevant interests to research participants, other relevant parties and the public, and to funding bodies, where required
- describe the processes that are involved in the identification and management of conflicts of interest, including who is responsible and accountable for these processes
- require that a record of interests in relation to current research grants is maintained
- require that a record be kept of how each identified conflict was managed, with appropriate consideration of confidentiality requirements
- include an expectation that researchers and staff will comply with the disclosure of interest policies and procedures of relevant external bodies
- be reviewed regularly to take into account new professional standards or regulatory developments.

3.2 Provide training for researchers

AP must provide ongoing training and education that promotes and supports responsible research conduct and that assists researchers and those in other relevant roles to understand and comply with AP's disclosure of interests policy.

3.3 Manage AP interests

AP must maintain a record of AP interests that may be perceived to affect the design, review, conduct and dissemination of research carried out. Examples of specific interests include intellectual property rights or licence revenue (existing or potential); industry or government funding of individual research projects, programs or infrastructure; or shares or options held by AP in any spin-off enterprises.

If an AP conflict of interest is identified, a determination must be made about the most appropriate measures for managing that conflict of interest.

In accordance with the principle of transparency, AP should respond to reasonable requests about the sponsorship of research and how any related competing interests or conflicts of interest were managed.

4. Responsibilities of researchers

This section provides guidance on the responsibilities that researchers have in relation to disclosure of interests and management of conflicts of interest.

4.1 Disclose interests and comply with relevant policies

Researchers must refer to and comply with AP policies and disclose interests in accordance with established processes. These processes should ensure that researchers:

- maintain records of activities that may be relevant to the assessment of whether a conflict of interest exists (e.g. consultancies; membership of boards of directors, advisory groups, or

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committees; or receipt of or delegation to receive funds, services or equipment from outside bodies to support research activities)

- disclose any new interest in a timely fashion
- comply with the disclosure of interests policies and procedures of external bodies that the researcher or staff member engages or is affiliated with, for example funders, conference sponsors or organisers and publishers. Relevant roles may include, but not be limited to: company director, not-for-profit board member, scientific advisor or editor
- update any disclosures of interest as circumstances change, and at least annually during the period during which the research remains active.

Researchers should engage in relevant training about AP policy and procedures for the disclosure of interests and the identification and management of conflicts of interest, and should seek out other relevant training opportunities when they perceive a knowledge gap.

5. Resolution of disputes

The AP disclosure of interests policy should include a description of a mechanism for raising concerns and the fair and timely resolution of disputes about any identification or management of a conflict of interest. The policy should include guidance on managing disputes involving researchers from multiple institutions.

Researchers should follow their institution's process to resolve any disputes that arise between them. The parties to the dispute should maintain records of agreements reached through direct dialogue or mediation.

6. Breaches of the Code

AP should investigate, assess and manage concerns or complaints related to conflict of interest that may constitute breaches of the AP Code in accordance with the *Guide to Managing and Investigating Potential Breaches of the AP Code for the Responsible Conduct of Research*.

Examples of breaches of AP Code that are related to the disclosure of interests include, but are not limited to:

- failing to disclose a relevant interest in a timely manner
- failing to abide by any decisions as to the management of a conflict of interest.

Development of Disclosure of interests and management of conflicts of interest guide

(Review frequency - 2 yearly)

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