



Getting the **green light** for ethical health research

A toolkit to identify, address,
manage and mitigate
conflicts of interest

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Foreword by the World Health Organisation Africa Office (WHO-AfrO)

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Preface by the Africa office of the CDC

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ACRONYMS

COI	Conflict of Interest
REC	Research Ethics Committee
SGC	Science Granting Council

Introduction

This section outlines the aim, audience, goals, and importance of the toolkit. It indicates why we have chosen to focus the toolkit for Research Ethics Committees and Science Granting Councils, and provides a breakdown of the structure of the toolkit.



WHAT IS THE AIM OF THIS TOOLKIT?

The aim of the toolkit is to provide:

- a set of guidelines, case examples and checklists to identify, address, and manage conflicts of interest in Health Research
- tools and mechanisms to strengthen the capacities of Science Councils and Research Ethics Committees

WHO CAN USE THIS TOOLKIT?

The toolkit is a user guide for staff in **Science Granting Councils and Research Ethics Committees**, particularly in sub-Saharan Africa. However, these guidelines may also be useful for institutions outside of the sub-Saharan African region, as well as for institutions other than those engaged in health research, such as funders of research, governments and other stakeholders. We welcome feedback on the toolkit from all users.

WHY IS THIS TOOLKIT IMPORTANT?

The guide serves to

- protect the integrity of health research from conflict of interest
- ensure that researcher independence is not dominated by third party interests that oppose the spirit and purpose of science.

WHAT DO WE HOPE TO ACHIEVE WITH THIS TOOLKIT?

The toolkit has several goals:

- Knowledge-sharing – to **raise awareness** on conflicts of interest in Health Research, and to provide **access to resources**.
- Capacity building – to increase the capacity of institutions to **recognise and identify** conflicts of interest.
- Facilitating resource production – to increase the capacity of institutions to **respond** to conflicts of interest and **mitigate** the potential effects of conflicts of interest.

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WHY IS THIS TOOLKIT NECESSARY?

Research findings from an online survey and in-depth interviews with senior representatives from sub-Saharan African Science Granting Councils and Research Ethics Committees indicated the need **for an increase in capacity to identify, address and manage conflicts of interest** in their institutions.

WHY FOCUS ON SCIENCE GRANTING COUNCILS AND RESEARCH ETHICS COMMITTEES?

Organisations such as Science Granting Councils (SGCs) and Research Ethics Committees (RECs) play key roles in sustaining science and health research.

These organisations may represent the interests of a government but may also take account of the interest of the country's scientific community. The roles of SGCs and RECs provide a unique **opportunity for these organisations to develop policy, and assess, manage and enforce rules affecting research partnerships**. They may also help to

protect independent health research and the reputation, integrity and equity of research partnerships.

WHAT SOURCES HAVE WE USED FOR THIS TOOLKIT?

This toolkit is drawn from several sources:

- the findings from an online survey and in-depth interviews conducted with senior representatives of sub-Saharan African SGCs and RECs
- findings from related literature
- expert opinion
- other toolkits and/or guidelines on the topic or on similar/related topics



WHAT ARE RESEARCH ETHICS COMMITTEES (REC)?

Research Ethics Committees, known in some countries as Institutional Review Boards, are usually attached to academic, commercial or government institutions. They review research proposals and provide guidance for ethical and scientific standards.

WHAT ARE SCIENCE COUNCILS?

Sometimes referred to as Public Research Institutes¹, Science Councils drive, catalyse and accelerate research and development, and serve State and other stakeholders' need for new knowledge². When they provide funding for research, they serve as Science Granting Councils (SGCs), that review, approve and monitor research grants. The exact terms of reference of SGCs are usually country-specific.

WHAT ARE THE GUIDING PRINCIPLES FOR THIS TOOLKIT?

The toolkit is guided by the general principles for the ethical conduct of research. In addition, it is important to take note of³:

- **Place:** use in a relevant context
- **People:** use is intended to respect and benefit people
- **Principles:** use is guided by good practice and values
- **Precedent:** use is guided by evidence

The toolkit is intended for use as a dynamic asset as part of an iterative process guided by findings from its practical application in institutions.

WHAT IS IN THE TOOLKIT?

- The toolkit is divided into several sections:
- Introduction
- Context
- Funding sources
- Assessment process
 - Step 1: Assess risk of potential internal conflicts of interest
 - Step 2: Assess risk of potential external conflicts of interest (between researchers and funders)
 - Step 3: Assess for conflicts of interest in the research process
- Governance processes

Each section contains a table with strategies for management. The tables use a traffic light system, with



Prohibit



Disclose and manage



Resolve/mitigate

Throughout the toolkit icons are used to indicate:



Definition



Case study



Checklist

We have also added resources with links for easy access.

We hope that this toolkit will help you to develop policy frameworks and operating procedures for conflicts of interest, or to refine existing policies and procedures.

The central goal of conflict of interest policies in health research is to **protect the integrity of professional judgment and to preserve public trust** rather than to try to repair bias or mistrust after it occurs⁴. The disclosure of individual and institutional financial relationships is a critical but limited first step in the process of identifying and responding to conflicts of interest. If health institutions do not act voluntarily to strengthen their conflict of interest policies and procedures, the pressure for external regulation is likely to increase.

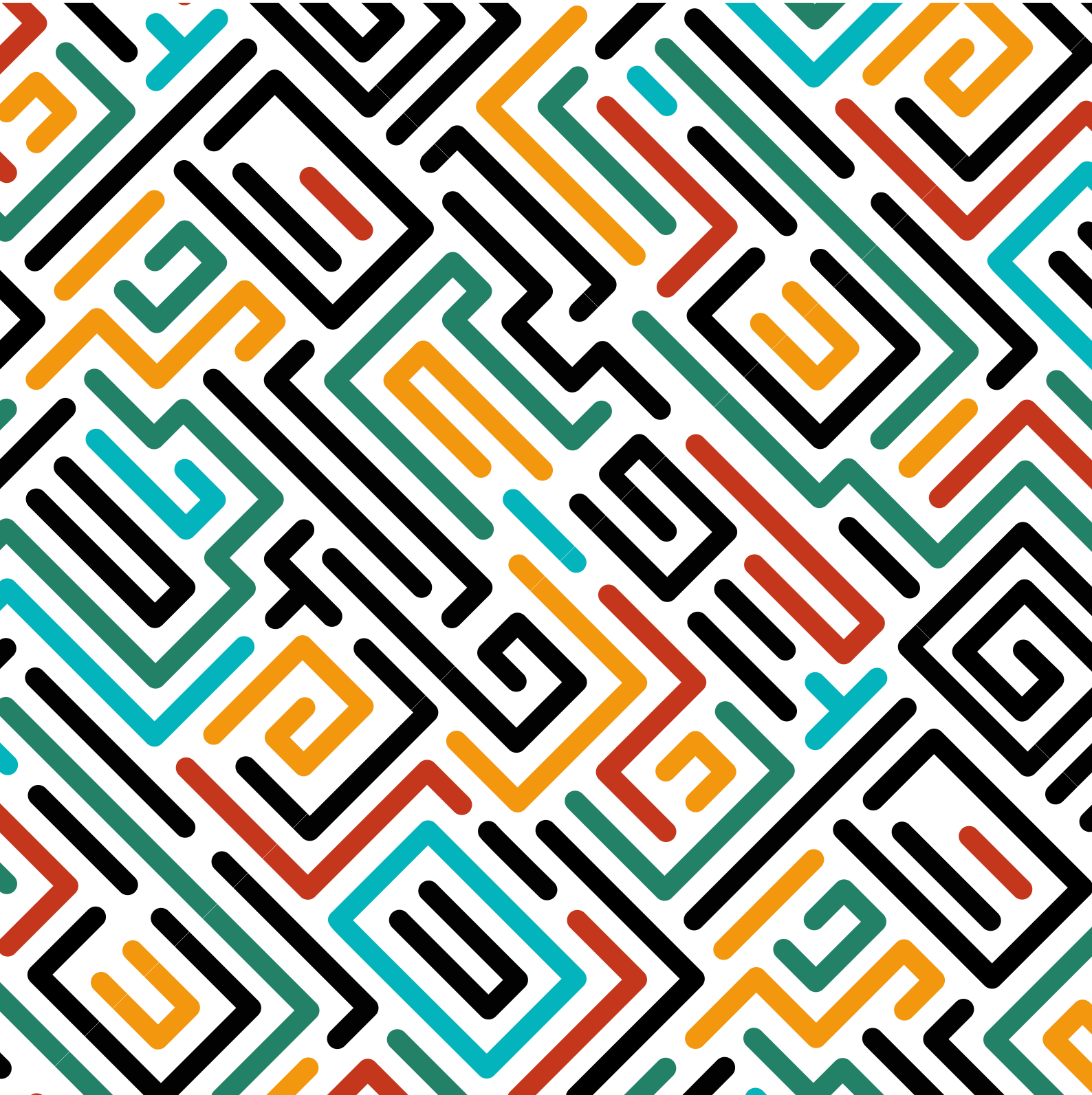
WHAT SHOULD YOU CONSIDER FOR DEVELOPING A CONFLICTS OF INTEREST POLICY FRAMEWORK?

The following list provides points to consider when developing or refining a policy framework:

- Provide training in ethical conduct.
- Develop an operational definition of conflicts of interest for the organisation or institution.
- Identify possible situations of conflicts of interest applicable to the institution, both internally within the organisation and in the engagement with external partners.
- Develop mechanisms to identify and manage conflict of interest situations.
- Provide processes to implement the policy.
- Provide training in the identification, prevention, and management of conflicts of interest.
- Demonstrate commitment to policy.
- Establish a culture of security and trust to facilitate conflict of interest disclosure.
- Develop mechanisms to assess and monitor implementation of the policy.
- Develop mechanisms to identify breaches of policy.
- Engage all stakeholders in the development of the policy.



Context



Research is key to promoting and improving health, and preventing disease. The role of research is vital for addressing the rapid rise in non-communicable diseases⁵. This is particularly important in regions such as sub-Saharan Africa⁶ where public health endeavours can benefit from collaborative partnerships between clinicians, medical researchers, scientists, engineers, pharmaceutical companies, biotechnology and medical device companies. However, the skilful, ethical and efficient conduct and management of these partnerships and collaborations are essential in preserving scientific rigour and research integrity.

An important way to preserve scientific rigour and research integrity is to address **Conflict of Interest (COI)**.



WHAT IS CONFLICT OF INTEREST (COI)?

COI can be defined as a conflict between the private interests and the official responsibilities of a person in a position of trust (Merriam-Webster), where circumstances create a risk for professional judgements or actions regarding a primary interest to be unduly influenced by a secondary interest⁷. A COI involves a potential for a breach of trust and can occur independently of any impropriety actually taking place. COI can, therefore, be defused, managed or avoided by intervention that precedes impropriety⁸. However, this requires that the potential or risk for a COI, or the COI and its potential consequences, be identified, recognized, acknowledged and managed effectively⁹.

ARE THERE DIFFERENT TYPES OF CONFLICT OF INTEREST?

There are three different types¹⁰ of COI

- An **actual** conflict of interest is when a stakeholder has the potential to overly influence research through the monetary or material benefits it presents to other research partners.
- A **perceived** conflict of interest is when a stakeholder has the potential to overly influence research through the non-monetary or non-material influences it has on other research partners.
- An **outcome-based conflict** of interest is when a stakeholder, involved in the policy-making or policy-implementation process, looks for outcomes that are inconsistent with the demonstrable public interest. This applies to issues where there is consensus on the public interest and where a particular stakeholder pursues goals that are in contradiction with that interest.

HOW DO CONFLICTS OF INTEREST THREATEN RESEARCH INTEGRITY?

COIs, if not identified and appropriately managed, can have serious and far-reaching consequences. These include:

- undermining of public health policies,
- reputational damage to researchers and/or research institutions
- putting human research subjects in harm's way
- failure of research systems to protect the independence of researchers from third party pressures if independent research findings are unpopular or disruptive to powerful entities in society

HOW DO RESEARCH PARTNERSHIPS WITH INDUSTRY RELATE TO CONFLICTS OF INTEREST?

Not all industry-funded research is inevitably questionable. Industry-funded research can be conducted transparently and without

interference, and can lead to important scientific contributions¹¹. However, it is important for research partnerships to be carefully analysed to **avoid, minimize or manage any conflicts of interest**.

The case study¹² below provides an example of an industry related COI.



CASE STUDY: REVIEW OF VITAMIN D SUPPLEMENTS AND SUSCEPTIBILITY TO SARS-COV-2 INFECTION OR COVID-19 OUTCOMES

A systematic review of studies that assessed vitamin-D supplementation with COVID patients found no robust evidence of the association between vitamin-D levels and severity of symptoms or mortality due to COVID-19. However there were clear indications of bias towards prescribing Vitamin-D.

COI: Associations with the pharmaceutical and/or food industries.

It is particularly important to manage collaboration between industry and health research institutions when the core business of the involved industry is to increase sales of its products, and the nature of the industry's products is known to have the potential for harm (such as the products of the tobacco and beverage alcohol industries). This could compromise research partnerships. Thus, it is important that organisations and institutions, as potential research partners with industry, are well-trained, and adequately-resourced to identify, address and manage COIs, if and when, they occur.

Other examples of how industry can undermine or influence research integrity are outlined as follows:

- Funding research by **recruiting scientists with a good reputation to benefit from their credibility**
- Association with organisations that have credibility **and securing opportunities to influence research protocols**
- Conducting Industry research that **contradicts results** of reputable scientists, causing doubt and confusion amongst consumers
- Deliberately **stalling policies** to mitigate against the effects of harmful products
- **Intimidation of critics**. For example, in Colombia and Mexico, people who proposed a tax on sugary drinks received threatening phone calls and had their computers hacked¹³
- Receiving funding from an organisation that is known to produce products that cause harm when used/consumed, and, thereby, **compromises research integrity by being complicit in the harm**, providing the organisation with authority
- Pressuring researchers to **publish findings that favour the research funder**, and to withhold findings that reflect the funder in a negative light, under threat of funding withdrawal
- Industry engaging with institutions of higher learning and **offering increased revenue** to institutions that are financially constrained, while seeking to influence the conduct, conclusions, and dissemination of institutional research, to its advantage¹⁴.

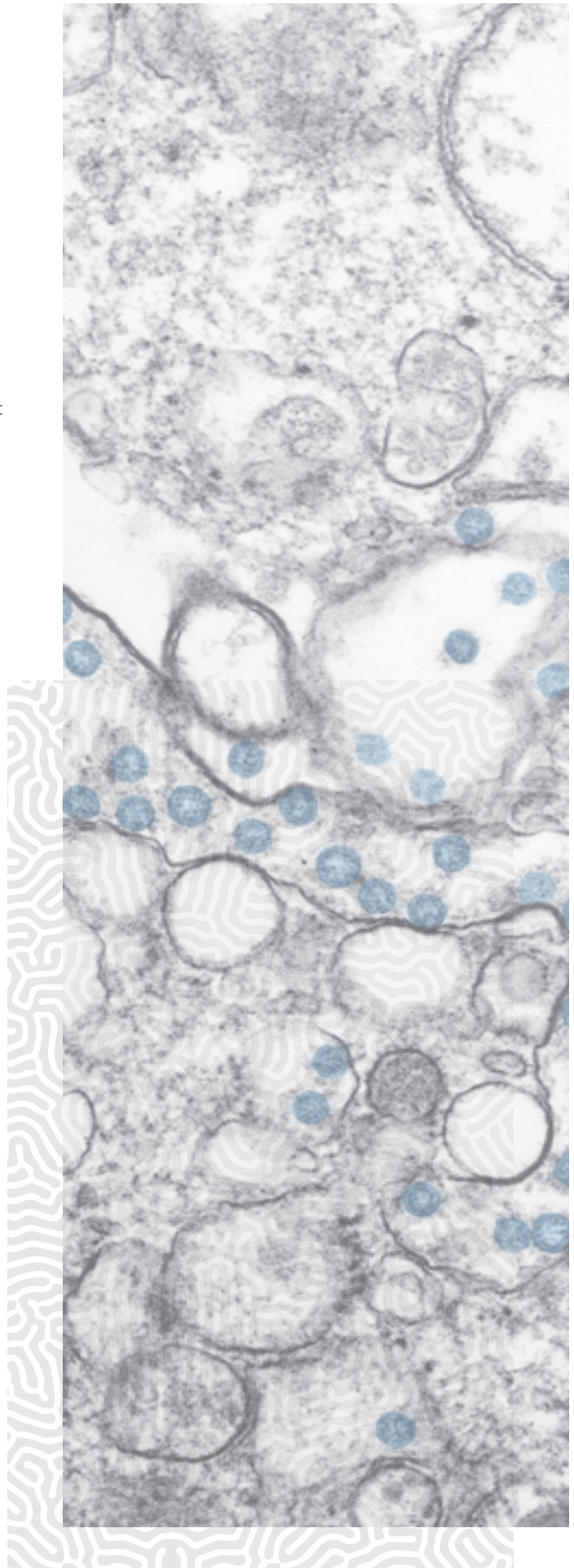
WHAT STRATEGIES CAN BE USED TO ADDRESS CORPORATE DOMINANCE?

Conflict of interest in health research needs to be identified, recognised and acknowledged so that it can be effectively addressed. Public health scholars need broad knowledge of the social and commercial

determinants of health, an understanding of the diverse systems (political, legal and economic) that underpin, drive, enable and perpetuate public health outcomes, and be prepared to engage in collaborative strategies.

Here are some strategies^{10, 13}:

- Promote **public health political activism** to counter corporate control.
- Advocate for use of state levies and taxes on tobacco, alcohol, and sugar-sweetened products to **fund resources** to counter business-led initiatives.
- **Share information** between public health institutions on corporate strategies that undermine public health initiatives.
- Develop, and exercise **resources, and strategies** to safeguard institutions and researchers from conflicts of interest.
- Use **media exposure** to raise awareness and establish a culture that stigmatizes corporate tactics to exert undue influence.
- Foster **social participation** by increasing the ratio of civil society and academia representation in any multistakeholder body, and establish criteria for civil society representatives (e.g., particularly vulnerable groups).
- Ensure **effective protection for whistle-blowers** and introduce post-employment rules to address “revolving doors” between government and industry.
- Increase **public funding** for research and policy development.





Funding sources



Financial support for research may be from many sources. The responsibility for ensuring that the funds are from ethical sources rest with researchers and with ethics review committees¹⁵. SGCs have a particular role in overseeing funding and ensuring that COIs are avoided, identified, mitigated and managed. No research is truly independent as the money must come from somewhere.

WHAT ARE THE COMPLEXITIES OF FUNDING SOURCES?

- Industries are fundamentally driven by the need to sustain or increase their profit share¹⁶ and, therefore, do not have public health interests as primary concerns. The Tobacco and beverage Alcohol industries produce commodities that are known to cause harm, and, as with other industries, always aim to increase sales of their products.
- Industries such as the Pharmaceutical and the Food Industries produce commodities that are both needed (life-saving medication; nutritional food) as well as products that are harmful (harmful drugs; sugar-sweetened beverages).

- Large corporations have large amounts of money, unlike many research institutions, particularly in low- and middle- income settings. This funding could enable necessary research to proceed but could also compromise the nature of the research or the findings.

When faced with a decision about whether to accept funding from a particular source, the following questions are important¹⁷:

- Have the funds been gained from sources that cause potential harm to others? (Such as funding from Tobacco, Alcohol, or Pharmaceutical companies)
- Could accepting this funding discredit the institution?
- Could accepting this funding negatively affect existing relationships within the institution?
- Could the outputs or results from this funding be used to enhance unethical practice?

The following case studies^{18, 19} provide examples of some of the complexity of COI with industry-related research:



CASE STUDY: FORMULA RESEARCH ON BABIES

A study was randomly allocating infant formula to exclusively breastfed low-birth-weight babies in Uganda and Guinea-Bissau assuming that this might prevent wasting and stunting. The trial in Uganda used a brand of powdered formula that was being recalled in the USA and New Zealand. The study overlooked the major health protection provided by exclusive breastfeeding and the serious risks associated with formula feeding of premature and low birth weight babies. These risks include life threatening Necrotizing Enterocolitis (NEC) and the formula’s negative impact on the microbiome. The formula company faces lawsuits over the deaths of children from NEC and its failure to adequately warn of the risks of formula feeding. Exclusive breastfeeding from the mother, or breastmilk from a wet-nurse, or donated, is now universally recommended.

A recent review of formula trials found an almost universal lack of transparency, biased, selective reporting, increasing use of formula at sensitive periods of development and a lack of scientific rigour.

COI: The industry uses a humanitarian cover to expand the baby food market.






CASE STUDY: TOBACCO INDUSTRY FUNDING FOR AIDS RESPONSE

Research on the tactics of transnational tobacco companies has documented how they used various charitable causes to subvert tobacco control efforts and influence public health policy. In both Latin America and sub-Saharan Africa, tobacco companies championed the AIDS response in order to delegitimize efforts to develop the World Health Organization’s Framework Convention on Tobacco Control.

COI: The Tobacco Industry aimed to exploit competition between health issues, and use the high-profile AIDS response to improve their reputation and market access.

The table below indicates guidelines for managing funding sources.

Table 1: Funding management

MANAGEMENT GUIDELINE	STRATEGY TO MANAGE FUNDING SOURCE
 Prohibit	Review boards should not approve research for which sources of funding stem from (a) organisations whose products or commodities have the potential for harm and (b) organisations that have an interest in the outcome of the research.
 Disclose and manage	Review boards should screen all funding sources for proposed research.
 Resolve/Mitigate	Institutions should establish policies that qualify acceptable funding sources and prohibit the use of unethical sources of funding (e.g. no funding from the Foundation for a Smoke-Free World)

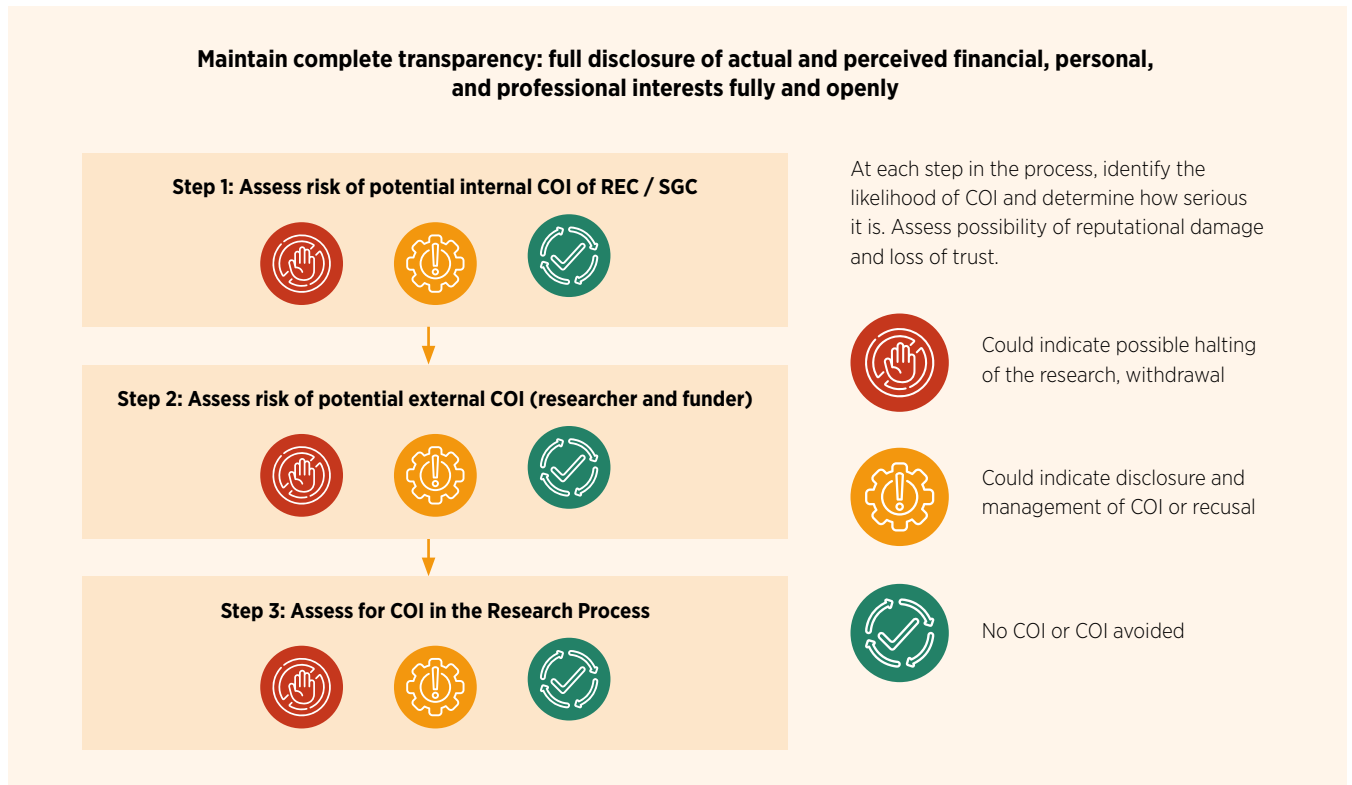
Assessment Process



Assessing Conflicts of Interest over the entire research process can be complex. We have divided this into steps to assess internal COI (within REC / SGC), external COI between the researcher and potential funder, and additional COI that need to be managed during the research process.

WHAT IS THE PROCESS FOR IDENTIFYING AND MANAGING CONFLICTS OF INTERESTS?

We have subdivided the identification and management process into three steps. The diagram below summarizes the possible process for both RECs and SGCs.



STEP 1: ASSESS RISK OF POTENTIAL INTERNAL COI

This section helps to identify COI that could occur in either Research Ethics Committee or Science Grant Council settings. It provides checklists and study examples as well as a table for managing potential internal COIs.

HOW CAN YOU IDENTIFY CONFLICTS OF INTEREST?

There are several domains of interest that need to be assessed. Interests could be primary or secondary.



WHAT ARE PRIMARY AND SECONDARY INTERESTS?

Primary interests might include **promoting and protecting** research integrity or the welfare of research participants or patients.

Secondary interests might include **financial interests, professional advancement and recognition**, or the desire to favour family or friends⁷.



CHECKLIST FOR IDENTIFYING COI

- Will anyone on the REC / SGC **benefit financially** from the research?
- Will anyone on the REC / SGC benefit financially or otherwise from having the research protocol approved or rejected?
- Will anyone on the REC / SGC **avoid a financial loss** because of the research?
- Is anyone on the REC / SGC associated in any way with the funder or research community?
- Is anyone on the REC / SGC **associated with a third party** that stands to benefit financially from having the research proposal approved/rejected and having the research conducted/postponed/cancelled?
- Is anyone on the REC / SGC **engaged in research similar to**, or associated with, the content of the research protocol?
- Does anyone on the REC / SGC **serve as a consultant for an organisation involved in the funding** or implementation of the proposed research?
- Will anyone on the REC / SGC **be associated with the drafting and/or dissemination of findings and outputs of the research?**

The following is an example of a COI relating to a REC / SGC



STUDY EXAMPLE:

An investigator on a multi-site clinical trial sits on the Ethics review committee of another institution where the trial is submitted for review.

COI: *The investigator has a primary interest in the outcome of the Ethics review. They need to recuse themselves from participating in the review.*

HOW DO YOU MANAGE INTERNAL CONFLICT OF INTERESTS FOR A REC / SGC?

As shown in the example above, the individual had a COI. Other individual COIs might be evident when:

- A REC / SGC member is an investigator on research under review
- A REC / SGC member of staff holds significant financial interests in the sponsorship of research under review by the REC / SGC
- Loyalty to colleagues submitting research protocols for review
- REC / SGC members are closely linked to the area of research under review and may be biased and therefore too lenient or too critical
- There is the possibility of impact of REC / SGC decisions on a REC / SGC member's own work, such as policy change
- An REC / SGC member has a personal agenda or deeply held ideological beliefs

COIs may also be shown at an institutional level. These might be demonstrated through:

- Pressure or desire to protect the institution
- Concern for institutional reputation or prestige or interest
- Promoting research rather than protecting research participants
- Undervaluation of the REC / SGC service
- The institution seeking to avoid risk and / liability
- Conflicting institutional or community values
- Pressure for speedy reviews
- Institutional ownership

The following is an example of a COI in SGC:



STUDY EXAMPLE:

The Director of a Health Research Institute is responsible for public / private research agreements. They have been asked to sit on the Scientific Grant Committee.

COI: *They would have an interest in the outcomes of approvals made by the SGC as this could favour their institute. They should not sit on the SGC as they would not be impartial.*

The potential for conflicts of interest can be addressed by instituting proactive regulations that would stop certain individuals from holding particular positions and would provide clear guidelines for management if these regulations were broken²⁰.

Institutions can employ the services of a dedicated agent/agency/ commissioner to identify and manage conflicts of interest, to refer to institutional policies on conflicts of interest, take action for disciplinary or criminal proceedings if necessary, and effect dismissal.

The response to incidents of conflicts of interest, thus, requires that institutions have clear, unambiguous, informed and regularly-communicated codes of conduct for all their employees and officials, both future and current.

Table 2 provides some guidelines for managing internal conflicts of interest for REC / SGCs

STEP 2: ASSESS RISK FOR POTENTIAL EXTERNAL COIs

This section provides definitions of both financial and non-financial COIs and provides checklists to identify potential COIs between researchers and funders. It looks at assessing severity of COIs and provides a table with strategies for managing external COIs. Examples and case studies are used to illustrate external COIs.

Conflict of Interests can be financial or non-financial²¹ and involve reputation or ideology.



WHAT IS A FINANCIAL / TANGIBLE CONFLICT OF INTEREST?

The most common conflict of interest in research is financial ties, such as sources of funds/grants for the research conducted, receipt of a consulting fee from a company manufacturing the drugs/equipment used in the research, stocks in such a company, or other financial connections that might influence an individual's thinking and affect the research outcome.

WHAT IS A NON- FINANCIAL / NON-TANGLIBLE CONFLICT OF INTEREST?

The most common non-financial conflicts of interest in research are personal relationships or professional affiliations. For example, a conflict of interest would exist if an author is the spouse/sibling/child of the editor of the journal to which they submit a manuscript or if the editor is, or was until recently, a supervisor who the author reported to. Some of the more complicated conflicts of interest in research are private or publicly held beliefs and ideologies that can give rise to potential biases in a researcher's work.

There are several factors that make evaluating partnerships complex. Different people or organisations/institutions might have **different perceptions of what constitutes a COI within the same context**²². If a partnership has the possibility of a COI, you will need to decide whether to engage with the partner, whether to eliminate, avoid or manage the COI.

Table 2: Management of COI for REC / SGCs

MANAGEMENT GUIDELINE	STRATEGY TO MANAGE INTERNAL COI FOR REC / SGC
 <p>Prohibit</p>	<p>Individuals should be screened for eligibility to participate on REC / SGC. For example, members should be required to have at least some training in research ethics and should not have a history of academic/research compromise.</p> <p>Members cannot have interests in companies that engage in partnership with the university or review board institution</p> <p>REC / SGC employees cannot hold a position in more than one REC / SGC department, or be simultaneously involved in the government legislature.</p> <p>REC / SGC officials/employees cannot be simultaneously employed in the private sector in any position, including that of a consultant.</p> <p>REC / SGC employees cannot own or have shares in private or other government entities that conduct business with the REC / SGC.</p> <p>REC / SGC employees cannot accept a government position that has links with the former REC / SGC or any REC / SGC for a period of 5 years after leaving the REC / SGC.</p>
 <p>Disclose and manage</p>	<p>Members should be required to disclose their financial assets regularly, including other sources of income, and business interests (including board memberships), and declare any past sources of income and business associations that could compromise their REC or SGC position/perspective or influence their decisions on research proposals that involve these companies.</p> <p>Members should recuse themselves (withdraw from participating) or be required to abstain from discussions and decisions where their personal interests might influence or compromise their views and decisions on research proposals submitted for review.</p> <p>In certain cases where it is agreed by the REC / SGC that their judgment could potentially be biased (e.g., Where the principal investigator is the chair of the committee), transfer of ethics review application and protocol to another research ethics committee.</p> <p>In certain instances, members may remain in the meeting to address certain questions that the REC / SGC might have, but under no circumstance are they allowed to vote during the meeting.</p>
 <p>Resolve/Mitigate</p>	<p>Members should, as a condition of membership, dissociate from or liquidate any private interests that might influence or compromise their roles and decisions</p> <p>Members with interests that can / do conflict with those of the REC / SGC decisions, should be restricted from access to information that might advantage those outside interests.</p> <p>Compromised individuals, or those with the potential for conflict of interest, can be transferred to another department or alternative roles, where such compromise would be neutralized, or the conflict of interest eliminated.</p> <p>Officials with identified conflicts of interest can be forced to resign, or be dismissed from the position, if the conflict of interest cannot be eliminated or the individual chooses not to dissociate from the conflicting private circumstances or interests.</p> <p>Bribery and fraud committed by any REC / SGC member, are regarded as corruption and pose a conflict of interest. These should be dealt with within the framework of criminal law.</p> <p>Policies at national and local level should be instituted to protect independence of REC / SGCs from influence</p>

HOW CAN YOU IDENTIFY EXTERNAL CONFLICTS OF INTEREST?

The checklist below is an aid for assessing potential conflicts of interest. It looks at the domains of finance, material, opportunity and outcomes. HOW CAN YOU IDENTIFY EXTERNAL CONFLICTS OF INTEREST?

The checklist below is an aid for assessing potential conflicts of interest. It looks at the domains of finance, material, opportunity and outcomes.



CHECKLIST TO IDENTIFY POTENTIAL EXTERNAL COIs

Financial:

- Will anyone benefit financially from the research or research contract?
- Will anyone avoid a financial loss as a result of the contract?
- In whose best interest is the research and research contract?
- Does a third party stand to benefit financially from the research or contract?

Material:

- Has research quality been compromised in favour of a specific partner/funder/provider?
- Has a fair process been followed to select the preferred product provider?
- Are the research funder's products/commodities known to produce harm?

Opportunity:

- Why has a particular community been selected for the research?
- How were the collaborating partners/funders/providers/participants selected for the research?
- What process was followed in selecting research staff?

Outcomes and Outputs:

- Who will manage the data analysis?
- Who will draft outputs (manuscripts, policy briefs, media statements)?

Here are some examples²³ that illustrate conflict of interests in the partner relationship:

- A researcher has a financial interest in a company sponsoring the research. This conflict of interest would be increased if the value of the researcher's interest is affected by the outcome of the research.
- A researcher is an inventor on a patent(s) or a creator of other intellectual property whose value is affected by the outcome of the research.
- A researcher takes part in the negotiation of a contract between the University and a company, where the researcher or his or her family or a close personal friend has a financial or non-financial interest (e.g. a directorship) in that company.
- A researcher conducts a clinical trial which is sponsored by any person or organisation with a financial interest in the results of the trial.

- Industry sponsors prizes for best conference presentations, and provides gifts samples for staff assisting at conferences. Industry gains credibility under the guise of CSR while hiding economic interests.
- A billionaire, whose wealth comes primarily from telecommunications but who also has investments in tobacco companies, proposes funding a university family health centre to support innovative programs in maternal and child health. This could cause reputational damage to the university while clouding the threats to health with mother and child health promotion.

WHAT CRITERIA ASSESS THE SEVERITY OF CONFLICTS OF INTEREST?



CHECKLIST TO ASSESS SEVERITY

Likelihood of undue influence

- What is the extent of the secondary interest? (This refers not only to monetary value of a grant or consultancy fee, but also to the influence that a relationship might have in creating a conflict of interests.)
- What is the scope of the relationship? (How long has it been going on, and how likely is it to influence professional judgement?)
- What is the extent of discretion? (How much oversight does a review board have over a research process, and how much freedom does the researcher have to make their own decisions?)

Seriousness of possible harm

- What is the extent of the primary interest? (What is the primary goal and what is potentially at risk?)
- What is the scope of the consequence? (What are the possible consequences for the research participants, the reputation of the researcher, and the institution?)
- What is the extent of the accountability? (What are the consequences for a breach in ethical conduct? Are policies and practices in place to apply sanctions if unethical conduct is disclosed?)

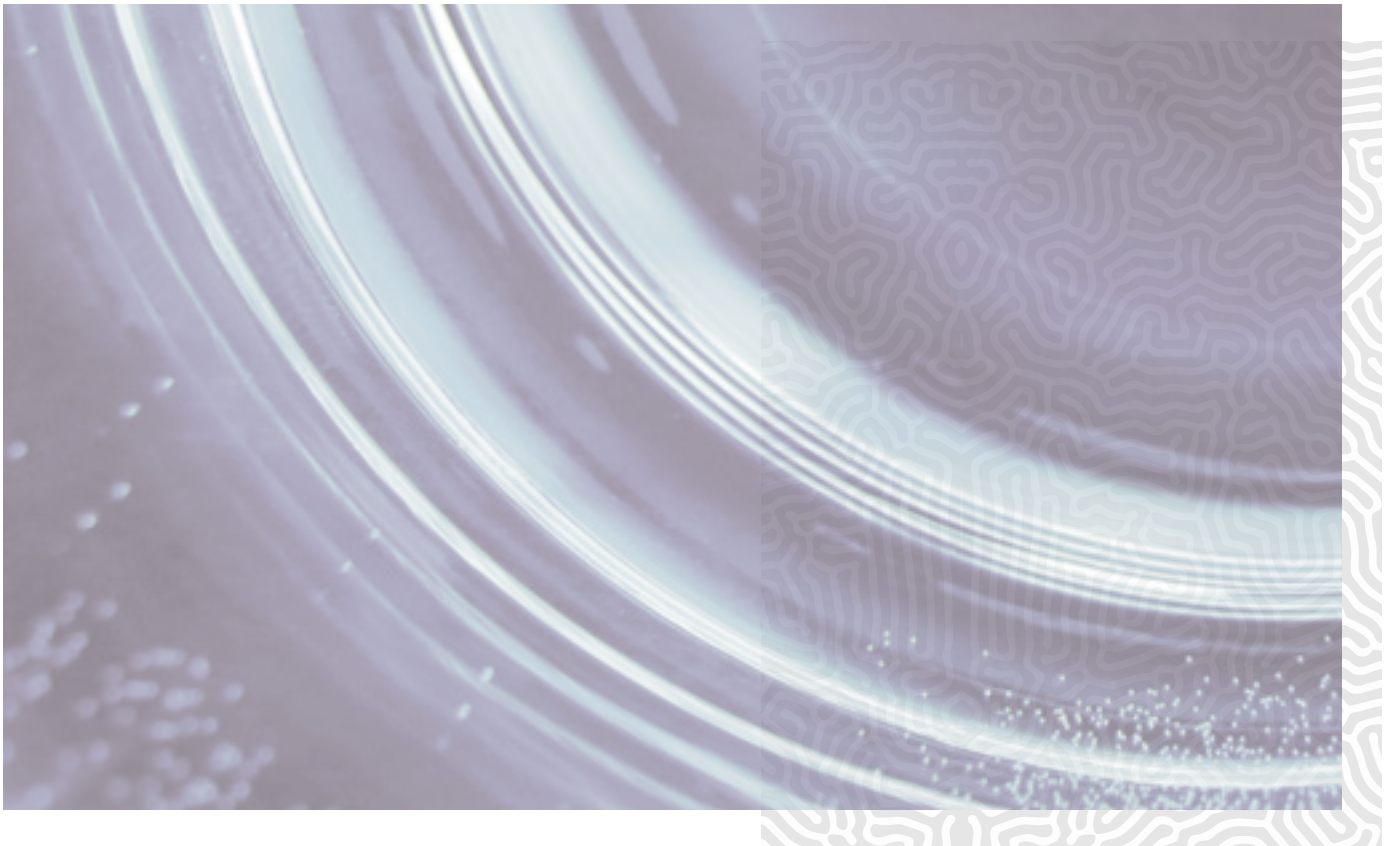
The following case study²⁴ provides an example of an external COI



CASE STUDY: JESSE GELSINGER EXPERIMENTAL GENE THERAPY TRIAL

The adverse effects of an experimental gene therapy were withheld by the lead investigator who had financial interests in the biotech company that was responsible for the development of the gene therapy. An 18 year old trial participant, Jesse Gelsinger, died.



COI: Bias in favour of the pharmaceutical company and financial gain.



HOW CAN YOU MANAGE EXTERNAL CONFLICTS OF INTEREST?

The following table provides a summary of possible strategies for managing researcher – funder COIs.

Table 3: Management for Researcher - Funder COIs

MANAGEMENT GUIDELINE	STRATEGY
 <p>Prohibit</p>	<p>Sever or disallow any relationship between a researcher and a research sponsor which may create actual or potential conflicts of interest.</p> <p>Disqualify any researcher from participating in all or a portion of any sponsored research.</p>
 <p>Disclose and manage</p>	<p>Researcher's financial interest in any research sponsorship or the commercial success of any strategy, product or service that is the subject of any research results being reported, should be disclosed.</p> <p>Researchers who seek approval for research protocols should disclose their sources of income and business interests, and declare former sources of income and business interests that might compromise their positions on research projects, and that could potentially influence their reporting of findings. They should rather disclose than assume that because something is unrelated that it does not need to be disclosed.</p> <p>Applications for funding should disclose any associations, both current and former, between the applicants and the REC / SGC and its members.</p>
 <p>Resolve/Mitigate</p>	<p>Establish independent committees to review research proposals</p> <p>Institutions should provide training for researchers to avoid acceptance of funding with possible COI</p>

STEP 3: ASSESS COI IN THE RESEARCH PROCESS

This section looks at points to consider when evaluating the research process. It provides case studies to demonstrate COIs and summarises how COIs can influence research design, conduct and results. It also outlines strategies for managing COIs in the research process.

HOW CAN CONFLICTS OF INTEREST INFLUENCE THE RESEARCH PROCESS?

Conflicts of interest don't only relate to conflicting interests within a partnership, but may also influence the way the research is designed, conducted or the results produced. Examples of this can be seen in:

- Choice of inferior comparator
- Manipulation of the randomization process
- Prematurely stopping a trial
- Fabrication of data
- Blocking access to data
- Providing an overly favourable interpretation of results (spin)

A table that summarizes inappropriate use/misuse of epidemiological methods can be found at: <https://ehjournal.biomedcentral.com/articles/10.1186/s12940-021-00771-6/tables/1>. This serves as a useful checklist for institutions to identify and guard against COI at the levels of research design and interpretation of findings. It helps to recognise the agendas that drive the needs for certainty at the expense of at-risk groups, and to identify the role of vested interests and influence in suppressing specific research and research topics.

The following example²⁵ demonstrates COI in the research process.



CASE STUDY: WITHHOLDING RESEARCH RESULTS IN ACADEMIC LIFE SCIENCE. EVIDENCE FROM A NATIONAL SURVEY.

The objective of the study was to identify the prevalence and determinants of data-withholding behaviour among academic life scientist. Over 3 000 academics from 50 universities were asked to complete a survey to indicate if they had delayed publication of their results for more than 6 months and whether they had refused to share research results with other university scientists in the last 3 years. Almost 20% reported delayed publication results to allow for patent application, to protect their scientific lead, to slow the dissemination of undesired results, to allow time to negotiate a patent, or to resolve disputes over the ownership of intellectual property. Approximately 9% refused to share results with other university scientists.

COI: They aimed to withhold results in order to secure lucrative patent deals.

Here are additional examples²³ that illustrate conflicts of interest in the research process:

- The researcher holds a position in an enterprise (e.g. as director) that may wish to restrict or otherwise manage adverse research findings for commercial reasons, or not wish to publish the results of the research.
- A postgraduate research student conducts research on a project that receives support from a company in which their supervisor has a financial interest or significant position.
- A researcher who has a senior editorial position with a commercial journal is also on a University library committee that recommends journal subscriptions.
- A researcher chairs a University committee which is to consider the allocation of funds to be shared between a number of Divisions/ Schools, including their own.
- A company that manufactures fertilizers and pesticides wants to sponsor a research study on farmers' protective clothing. The company might want to emphasise the role of protective clothing and ignore the harmful effects of its products to farm produce and the environment. The university research might be influenced to focus on the protective gear and minimise the effects of the company products.

WHAT ELSE NEEDS TO BE CONSIDERED FOR ETHICAL HEALTH RESEARCH?




Risk is a complex concept. There is always uncertainty around the potential benefits of health research. The World Health Organization puts forward some key issues that REC / SGC need to consider²⁶:

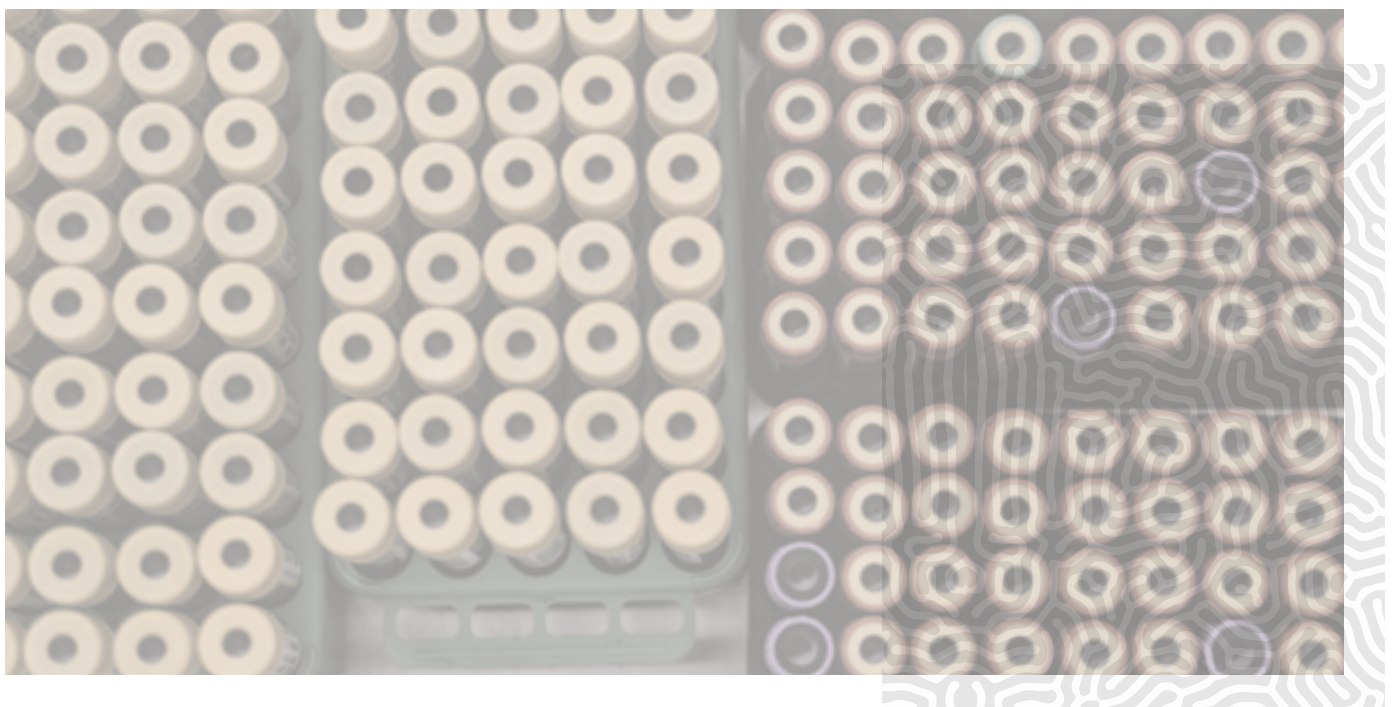
- Risk/benefit assessment does not stop at the individual; it must also consider communities and health systems.
- The risks of research are not limited to potential physical harms, but can also include psychological, social, legal, and economic ramifications.
- Evaluation of the benefits of research must distinguish between direct benefits for the individuals who participate in the study, expected benefits for the community in which the study will take place and potential benefits to science and the world at large.
- Identifying and evaluating risks and benefits is not purely scientific endeavour. They require the involvement of all stakeholders in research, including investigators, community and civil society representatives, lawyers, and health authorities.

WHAT STRATEGIES CAN HELP TO MANAGE CONFLICT OF INTERESTS IN THE RESEARCH PROCESS?

The following table outlines some strategies^{21, 27, 28, 29} for managing COI within the research process.

Table 4: Management for the research process

MANAGEMENT GUIDELINE	STRATEGY
 <p>Prohibit</p>	<p>Exclude the funder from participating in the research design, data analysis and the reporting of findings</p> <p>Peer Reviewers for academic publications should recuse themselves from reviewing articles of any rival research group so as not to influence the outcome of the publication.</p>
 <p>Disclose and manage</p>	<p>Institutions should establish disclosure procedures.</p> <p>Researchers' financial interests with a sponsor should be fully disclosed to any human research participant.</p> <p>Researchers' financial relationship with the sponsor should be included in all written and oral presentations, publications and abstracts.</p> <p>Funders should report funding details to the researcher's organisation and disclose the information publicly.</p> <p>Publishers: To protect authors' and reviewers' rights, publishers are responsible for:</p> <ul style="list-style-type: none"> • selecting reviewers who do not have a conflict of interest with the authors • protecting reviewers' identities • maintaining a neutral and objective stand in the peer review process. <p>Open peer review can pose a major challenge to these requirements.</p>
 <p>Resolve/Mitigate</p>	<p>Establish independent committees to review research proposals and monitor research processes.</p> <p>Ensure that contracts ensure complete access to data.</p> <p>Establish mentoring practices so that experienced researchers can help junior colleagues and students recognize, avoid, and manage conflicts of interest.</p>



Governance Process



This section highlights COIs to consider when establishing governance processes. It outlines criteria to evaluate COI policies, provides a checklist for identifying and declaring COIs and strategies for establishing governance processes. Finally, this section includes policy enforcement and reporting.

There are potential conflicts of interest within health systems that might influence policies. It is important to consider these when establishing governance processes. Table 5³⁰ summarises some COIs and the potential effect for policy.

Table 5: Competing interests and their effects on health policy

	COMPETING INTEREST	EXAMPLE OF EFFECT OF POLICIES
Policy makers or regulators are expected to formulate and implement policies that ensure appropriate care delivery by private health-care providers	A secondary relationship that results in financial, social, or familial connection with the institutions they are responsible for regulating, such that the policy actor or regulator may prefer weaker controls.	Weakening of policies: policy formulation influenced such that weaker rules are introduced. Or, policy implementing bodies (eg, drug inspection agencies) are under-resourced to enforce rules.
Formal health-care providers have a responsibility to provide and support the provision of health care in accordance with local regulations and professional ethics standards	Financial flows from informal (illegal) providers or practice create additional sources of income for formal providers.	Covert opposition to change: formal providers publicly support stronger regulation of informal practice, but covertly influence the policy-making process to enable it to continue and thrive.
Policy decisions should reflect public health evidence and best practice	Policy makers do not want to introduce or enforce rules to curtail the private sector as they know these will be unpopular with large segments of the population and could potentially expose gaps in roles of the public sector.	Regulatory impasse: stronger regulations to restrict inappropriate private sector activities, which are good from a public health perspective, are avoided as they might make policy makers unpopular and affect personal career growth.

WHAT CRITERIA CAN BE USED TO EVALUATE CONFLICT OF INTEREST POLICIES?

The checklist below proposes some criteria for evaluating policy⁷.



CHECKLIST FOR EVALUATING POLICY

Proportionality:

- Is the policy effective, efficient, and directed at the most important and most common conflicts? Will anyone avoid a financial loss as a result of the contract?

Conflict of interest policies and procedures may create harms or burdens as well as benefits. Do the policies and their implementation unnecessarily interfere with the conduct of legitimate research, teaching, and clinical practice?

Transparency:

- Is the policy comprehensible and accessible to the individuals and institutions that it may affect?

Transparency is essential to determine if conflict of interest policies are reasonable and are being implemented fairly. Transparency can also help institutions learn from each other about more and less successful ways of handling particular situations.

Accountability:

- Does the conflict of interest policy indicate who is responsible for monitoring, enforcing, and revising it?

Leaders of accountable institutions need to explain institutional policies and monitor and accept responsibility for the consequences, both beneficial and harmful.

Fairness:

- Does the policy apply equally to all relevant groups within an institution and in different institutions?

In an academic medical centre, the relevant groups would include faculty, medical staff, students, residents, fellows, members of institutional committees (e.g., institutional review boards, formulary committees, panels developing practice guidelines, and device purchasing committees), and senior institutional officials.

Justice:

- Are the interests of the most vulnerable served optimally by the policy by balancing or controlling different interests?

HOW DO YOU IDENTIFY AND DECLARE CONFLICTS OF INTEREST?

The following checklist²¹ will help to establish a process for identifying and declaring COIs.



- **List all sources of financial support** you and your co-authors receive that may be considered as posing a conflict to your research objectives. These need not be just the support you receive for the research you are trying to publish now, but any other grants/funds that you receive for other projects.
- **List any social or personal activities/interests** that may be considered to influence how you conduct your research.
- **Review any institutional ties** you may have in the present or have had in the recent past (where you worked/volunteered, etc.) that can be said to affect your objectivity in your work.
- **Potential for conflicts and ways to deal with them** are constantly evolving. **Keep yourself updated** and seek out new information.

WHAT SHOULD AN ETHICS POLICY ADDRESS?




An ethics policy needs to provide guidelines for expected conduct, consequences for not following codes, and processes for reporting breaches in conduct. Some important issues³² to consider are:

- **Confidentiality** – Members are required to protect the confidentiality of all privileged information relating to organisational business or prospects.
- **Conflict of Interest** - Members will proactively disclose financial, personal, professional, and other conflicts of interest that could compromise the trustworthiness of their work on behalf of the organisation.
- **Intellectual Property** - Members should not knowingly infringe the intellectual property rights of other parties.
- **Professional Misrepresentation** – Members are expected to recognise and honestly represent individual boundaries of professional competence.
- **Harassment, Discrimination, Bullying and the Abuse of Power** – The organisation should provide a clear statement on impacts and its intolerance for harassment, discrimination and bullying.
- **Reporting Ethical Violation of Others** – Members are asked to take responsibility to act or intervene where possible to prevent misconduct and report such misconduct when it occurs.
- **False accusations / Improper complaints** – Penalties are outlined for making false or improper complaints and such accusations are noted as an ethical violation.

WHAT STRATEGIES CAN HELP TO ESTABLISH GOVERNANCE PROCESSES?

The following table outlines some strategies for establishing governance processes.

Table 6: Strategies^{7, 31} for Governance processes

MANAGEMENT GUIDELINE	STRATEGY
 <p>Prohibit</p>	<p>Institutions should establish policies that restrict participation of researchers with COI</p>
 <p>Disclose and manage</p>	<p>Institutions should establish disclosure policies and provide for an agreed course of action should a researcher fail to declare their COI</p> <p>Institutions should strengthen disclosure procedures and standardise disclosure content and formats.</p> <p>Institutions should provide templates which may be used by anyone to evaluate and disclose potential conflicting interests at any stage of the research process. These stages include the problem definition/proposal stage, hypothesis formulation, stakeholder oversight/community engagement phase, research design, execution, analysis, interpretation, pre-publication conference presentation, peer-review, dissemination of results, statements made to media or policy-makers, serving on board and advisory committees, data- sharing, and data archival.</p> <p>Policies and forms should be regularly updated.</p> <p>Members nominating candidates for election onto a review panel (i.e., nominators) should be required to submit, along with their nominee details, a disclosure statement revealing any actual or perceived COI.</p>
 <p>Resolve/ Mitigate</p>	<p>Institutions should provide education on COI</p> <p>Institutions should adopt and implement COI policies</p> <p>Advocate for independent research financing</p> <p>Create a national programme for reporting of company payments</p> <p>Strengthen governance processes by engaging physicians, researchers, and medical institutions in developing policies and consensus standards</p> <p>Lobby a range of supporting organizations, including accrediting groups and public and private health insurers, to promote the adoption and implementation of conflict of interest policies, and promote a culture of accountability that sustains professional norms and public confidence in health research.</p> <p>Research on conflicts of interest and conflict of interest policies can provide a stronger evidence base for policy design and implementation.</p>

HOW DO YOU INSTITUTE AND ENFORCE COI REGULATIONS AND POLICIES?

It may be difficult to eliminate conflicts of interest through withdrawing participation. Disclosure of COI has no effect on the actual conflict of interest and its potential consequences³³. However, there is value in the **transparency of disclosure** as it is recognised as a necessary part of identifying the potential for research bias³⁴. In addition, the negative effects of concealed academic entrepreneurship needs to be recognised³⁵. However, existing COI management policies might benefit from additional and complementary mechanisms.

One strategy is for members of institutional ethics bodies to be **included in the drafting and review of the regulations**. This would enable inclusivity, engagement of stakeholders, opportunities for feedback and clarification, and would be more likely to achieve buy-in from employees than if the regulations were simply imposed²⁰.

Another strategy is for institutions to have a **dedicated agency or commissioner to provide institutional oversight** with specific reference to the protection and guidance of employees in navigating the potential for conflicts of interest. Independent ethics committees could provide guidance for patient advocacy organisations in their financial engagements with industry players³⁶.

HOW DO YOU REPORT COIs?

By legal definition, **conflict of interest is usually considered to be an issue of ethical conduct**. It is seen as a conflict between professional and private interests. Corruption (commonly defined as a subset of conflicts of interest, where the private interests of the individual are mainly financial), is commonly regarded as an **incident of criminality**³⁷. However, in this toolkit, we recognise that “a fine line” marks the difference between conflicts of interest and corruption, particularly as some forms of conflict of interest might be sufficiently harmful to be regarded as criminal, even when the conflict of interest does not necessarily constitute fraud or corruption.

Usually, COIs that are not considered to be legally criminal are dealt with internally within the organisations involved. An intervention is escalated to legal proceedings outside of organisations only when considered to be sufficiently harmful to the organisations.

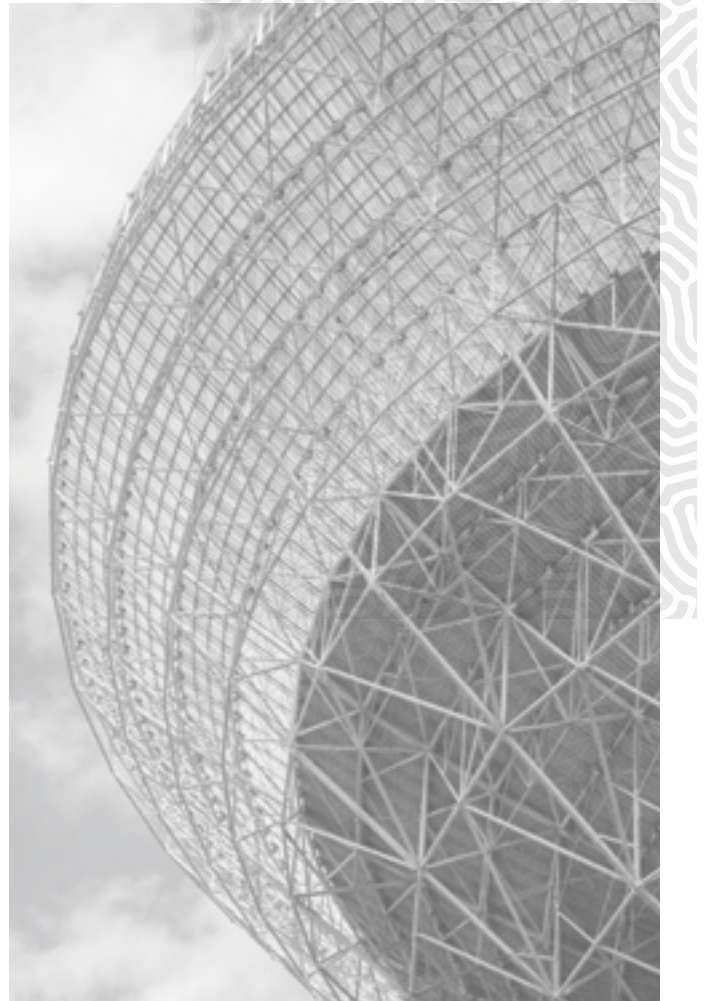
The disclosure of knowledge about, and evidence for, the occurrence of a conflict of interest can be reported by the person directly involved in the COI (self-disclosure), or could be reported by another person and constitute an act of **whistleblowing**.



WHAT IS A WHISTLEBLOWER?

A whistleblower is someone who discloses illegal, immoral, or illegitimate practices under the control of their employers, to persons or organisations that may be able to effect action³⁸.

Globally, State institutions are characterised by bureaucratic procedures that potentially discourage a culture of whistleblowing and fail to protect whistleblowers. In developing countries, there are further challenges for whistleblowers.



In these settings, institutions are often characterised by

personalised loyalty, loosely regulated institutional environments, fluid policy-ownership, extreme disorganisation, institutionalisation deficits (limited statehood conditions), dishonesty, haphazardness, amateurism, and autocratic and self-serving leadership traditions. Under such conditions, conflict of interest is elusive, corruption is less punitive, whistleblowers are despised,...³⁹

Whistleblowers are often regarded simultaneously as heroes for disclosing wrongdoing, and as traitors for disclosing institutional practices. In addition, there has been movement globally towards a recognition of the need for whistleblower protection to foster good governance⁴⁰.

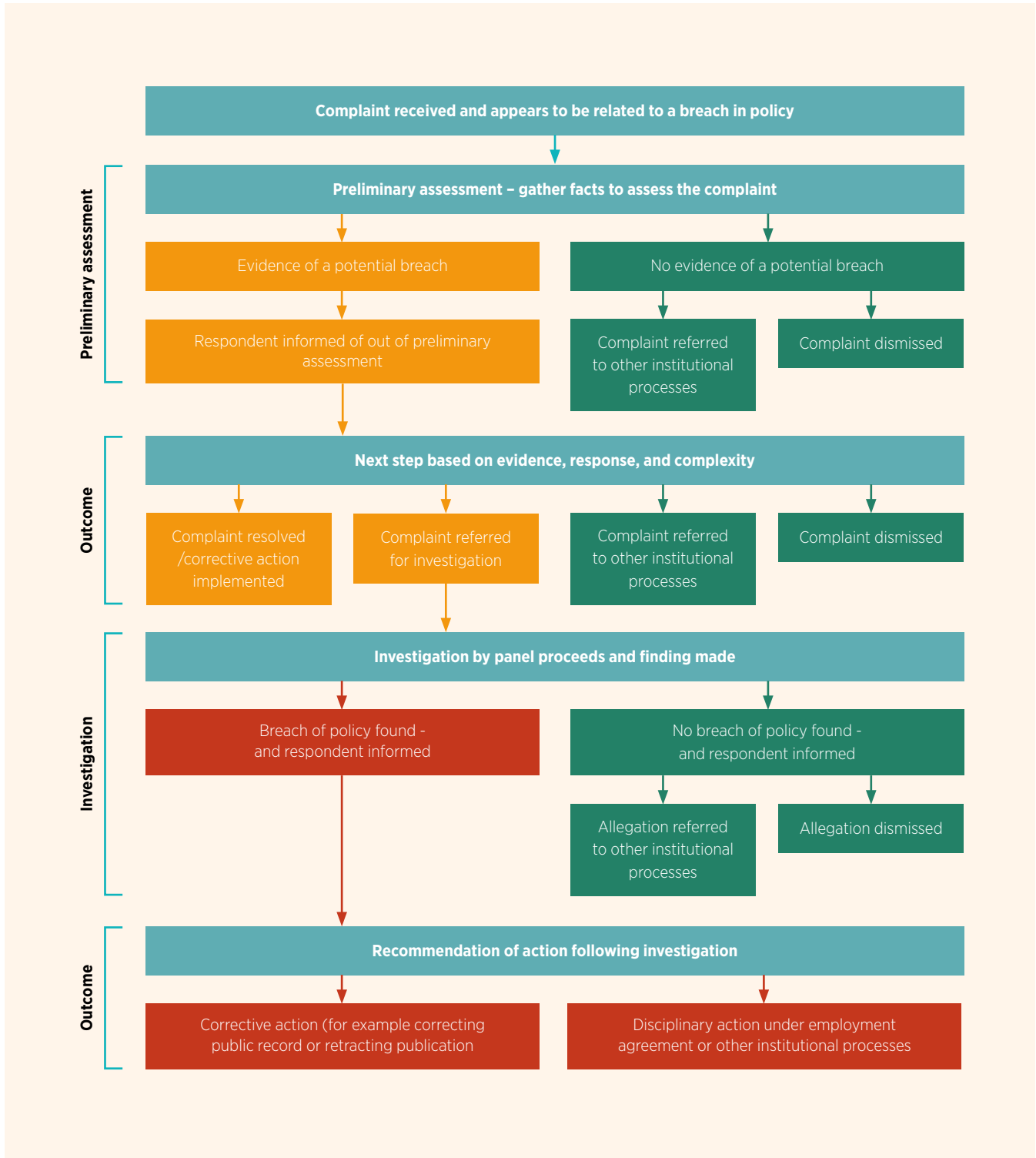
Whistleblowing needs to be seen within a framework of anti-corruption as opposed to an act of freedom of expression or human rights⁴¹ and to counter “whistleblower protection legislation (being) implemented in a reactionary manner”³⁹. Employees of institutions usually first try to report a perceived COI within their organisation. However, evidence indicates that, even when there are mechanisms in place for whistleblowing to be addressed, and when whistleblowers are assured of protection, these mechanisms do not translate into a culture of increased whistleblowing, with, thus, no reduction in whistleblowing, and with no decrease in unethical behaviour within the institution⁴².

WHAT IS THE PROCESS FOR INVESTIGATING A COI?

When a failure to meet the principles and responsibilities of a policy regarding COI is reported, it is important to investigate the complaint and have a process for following this through.

The policy needs to indicate who should report a possible conflict – and to whom they should report it. In addition, the policy should include the repercussions of undisclosed conflicts³².

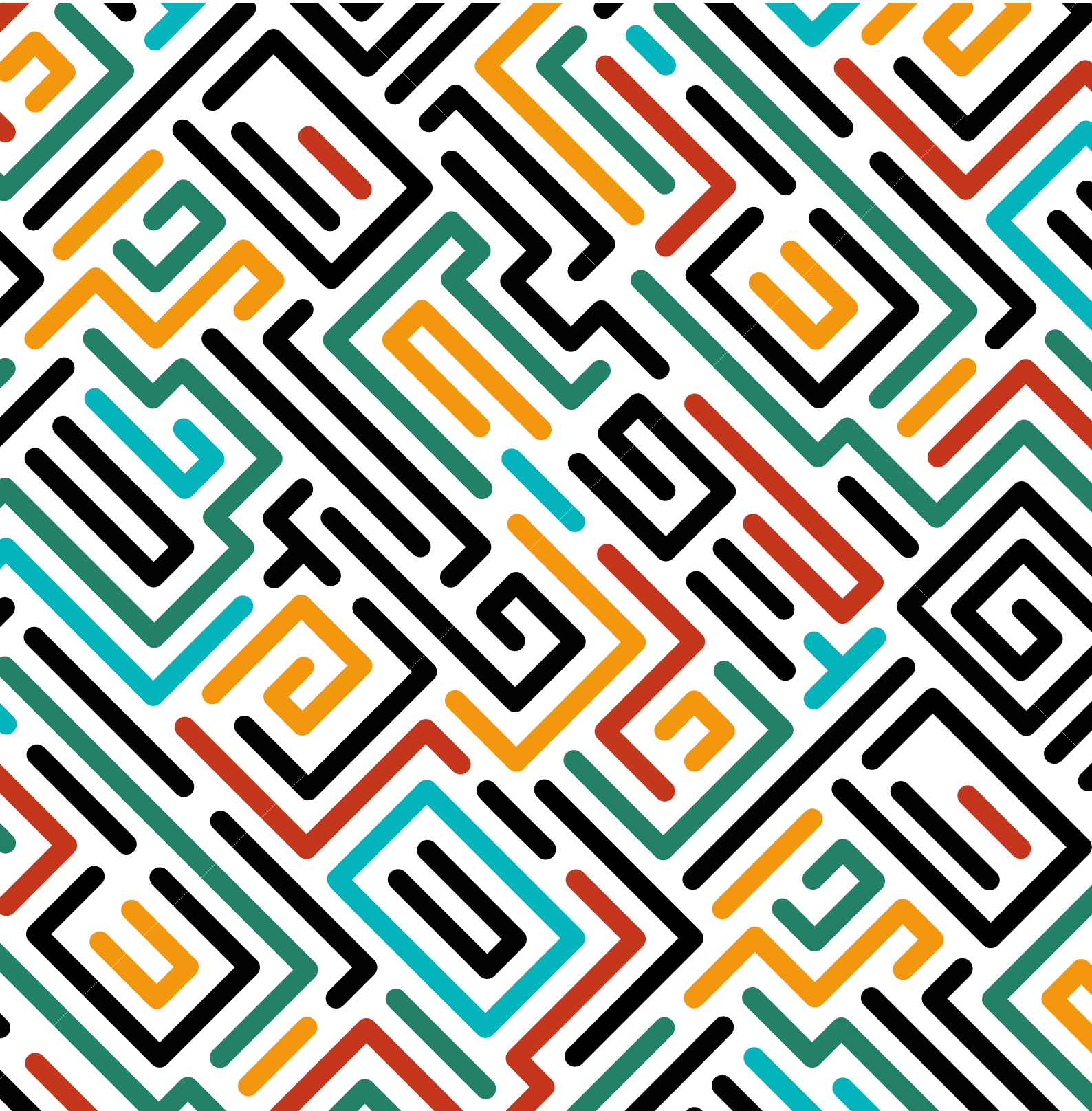
The flow diagram⁴³ below provides a suggested process for investigating a complaint.





LAGOS
FOOD
BANK

Conclusions



RECs and SGCs have a responsibility to respond to incidents of conflicts of interest. This requires that institutions have ways to assess risk and identify COI, as well as clear, unambiguous, informed and regularly-communicated codes of conduct, procedures and policies for all their employees and officials which are regularly updated with the latest information. We hope that this toolkit has provided you with tools and guidance to identify, address, manage and mitigate conflicts of interest.

Important summary points from this toolkit include:

- **Avoid and minimise conflict of interest**
Although it is not possible to avoid all sources of COI, it is in the best interests of the scientific community and of individual researchers to recognise conflicts of interest, and to take steps to cancel or limit those conflicts.
- **Disclose interests**
If COIs cannot be avoided, then those conflicts should be disclosed. At minimum, the institution and any other parties with a significant interest should be made aware of the extent and nature of the conflict.

ADDITIONAL RESOURCES

Conflicts of interest: A good practice guide. Northern Ireland Audit Office, 2015.

https://www.niauditoffice.gov.uk/files/niauditoffice/media-files/conflicts_of_interest_good_practice_guide.pdf

This guide seeks to provide clear and simple advice relevant throughout the public sector to help organisations draft and implement conflict of interest policies. It also aims to help board members and staff in key positions to recognise when they have a conflict of interest and how they should act when such a situation arises. The guide includes examples of good practice as well as case illustrations of all types of conflicts of interests with the associated problems and possible solutions. Usefully, the guide provides a typology of conflicts of interest and specifies what to do when the policy is breached. Several appendixes offer good practice examples and sample declaration of interest forms.

Conflict of interest: Legislators, ministers and public officials. Carney, G., 1999.

<https://gsdrc.org/document-library/conflict-of-interest-legislators-ministers-and-public-officials/>

to assist legislators, ministers and public officials to identify exactly what constitutes a conflict of interest and how conflict of interests pose ethical dilemmas in the performance of an official's duties and responsibilities, and to suggest various mechanisms either to prevent such a conflict of interest arising, or to resolve the conflict when it does arise. These include disqualification from office, disclosure of personal interests, codes of conduct, ethics training and enforcement mechanisms.

Conflicts of Interest and Commitment for Faculty and Investigators Policy. George Washington University

<https://compliance.gwu.edu/conflicts-interest-and-commitment-faculty-and-investigators-policy>

An example COI policy

Conflict of interest and monitoring financial assets. Organisation for Security and Co-operation in Europe (OSCE), 2004.

<http://www.osce.org/eea/13738?download=true>

Chapter three of the OSCE report Best Practices in Combating Corruption (pp.28-41) provides two checklists: (1) to help individual

- **Manage conflicts**

Disclosure is often not enough. For every step of the research process, attempts should be made to keep individuals with COIs away from all decision-making functions.

However, some COIs cannot be adequately managed by disclosure or procedures alone – bear in mind that there may be some COI that should be completely prevented.

- **Keep learning**

Both the potential for conflicts of interest and the strategies for dealing with those conflicts are evolving. Look for information so that you can keep up with current regulations.

public servants identify situations where a conflict of interest is likely to arise and (2) to assess whether a disclosed conflict of interest might require other public officials to ask the person in question to stand aside. It also examines in detail how to avoid nepotism and cronyism in public sector appointments, suggests methods to monitor public officials' income and provides best practice examples of post-public sector employment restrictions for government ministers.

Conflict of interest and public life: Cross-national perspective. Trost, C., and Gash, A., (eds), 2008.

<http://www.cambridge.org/gb/academic/subjects/philosophy/political-philosophy/conflict-interest-and-public-life-cross-national-perspectives>

provides a comparative account of conflict of interest regulations across four Western democracies: the United States, the United Kingdom, Canada and Italy. The study situates conflict of interest regulations within a broader governance discourse, identifies the structural, political, economic and cultural factors that have contributed to the development of conflict of interest regulations, and assesses the extent to which these efforts have succeeded or failed across and within different branches and systems of government.

Conflict of interest in global, public and corporate governance. Peters, A., and Handschin, L. (eds), 2012.

<http://www.cambridge.org/gb/academic/subjects/law/comparative-law/conflict-interest-global-public-and-corporate-governance>

This interdisciplinary handbook provides insight into some of the latest thinking on conflicts of interest at a global level, in both the public and corporate sectors.

Frequently asked questions: Johns Hopkins University Policy on Conflicts of Interest and Conflict of Commitment

https://jhura.jhu.edu/wp-content/uploads/2020/12/COI_COC-Policy-FAQs12.21.2020.pdf

This document provides frequently asked questions about the COI policy with examples to clarify when COI might occur.

Johns Hopkins University Policy on Conflicts of Interest and Conflict of Commitment

<https://policies.jhu.edu/doc/fetch.cfm/DqwggsL>

An example policy on COI

Managing conflicts of interest in the public sector: A toolkit. OECD, 2005.

<http://www.oecd.org/gov/ethics/49107986.pdf>

Experience shows that identifying and resolving conflicts of interest can be difficult to achieve in practice. To overcome this barrier, in 2005, the OECD developed a practical toolkit focusing on specific techniques, resources and strategies for the identification, management and prevention of conflict of interest situations. It provides non-technical, practical help to enable officials to recognise problematic situations. The tools are based on examples of sound conflict of interest policies and practices drawn from OECD member and non-member countries.

Managing conflicts of interest in the public service: OECD guidelines and country experiences. OECD, 2004.

<http://www.oecd.org/gov/ethics/48994419.pdf>

Essential reading for those who want to gain a comprehensive grounding in conflict of interest mitigation strategies, the OECD guidelines have three core objectives. Firstly, to provide a practical framework of reference to help governance and public organisations review and modernise existing policy solutions in line with good practice. Secondly, to promote a public service culture in which conflicts of interest are properly identified and resolved. Thirdly, to support partnerships between the public, private and non-profit sectors in identifying and managing conflict of interest situations. The guidelines set out four core principles for public officials to follow when dealing with conflict of interest situations in order to maintain trust in public institutions: (1) serving the public interest, (2) supporting transparency, (3) promoting individual responsibility and (4) creating an organisational culture that does not tolerate conflict of interest.

NCD Alliance Organisational Conflict of Interest Policy

https://ncdalliance.org/sites/default/files/NCDA_Organisational_COI_Policy_April_2020_FINAL.pdf

An example COI policy document

Post-public employment: Good practices for preventing conflict of interest. OECD, 2010.

http://www.keepeek.com/Digital-Asset-Management/oecd/governance/post-public-employment_9789264056701-en#page1

This OECD report from 2010 reviews the measures taken in OECD countries to avoid conflicts of interest when officials leave public office. It provides guidance to policy makers and managers on how to review and modernise rules, policies and practices to prevent and manage conflicts of interest.

Recommendation of the Council on OECD Guidelines for Managing Conflict of Interest in the Public Service. OECD. 2022

<https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0316>

This document provides guidelines for public employees, both pre- and post- employment to address gaps between the implementation and enforcement of policies, particularly as these relate to State-private partnerships.

Regulating the revolving door. Transparency International Working Paper, 2010.

http://www.transparency.org/whatwedo/publication/working_paper_06_2010_regulating_the_revolving_door

This short working paper offers an introduction to the problem of the revolving door and the associated conflicts of interest which can arise. It goes on to examine the nature of corruption risks and possible remedies.

Sitting on the fence: Conflicts of interest and how to regulate them. Reed, Q., 2008.

<http://www.cmi.no/publications/publication/?3160=sitting-on-the-fence>

This paper describes the problem of conflict of interest for public officials and the main ways in which it can be tackled, with particular focus on the regulation of elected officials. The paper describes three main types of regulation – prohibitions on activities, declarations of interests and exclusion from decision-making processes – and how these may be best implemented in practice.

Summary table on Institutional guidelines from RECs and SGCs in Sub-Sahara African countries on how to identify and manage common conflict of interest situations in health research

This table provides an overview of potential COIs, and the institutional strategies in place to manage the COI. It summarises policies from Nigeria, Uganda, South Africa, Rwanda, Sudan, Ghana and Kenya

The open government guide to asset disclosure and conflicts of interest. Open Government Partnership, 2014.

<http://www.opengovguide.com/topics/assets-disclosureconflicts-of-interest/>

This document provides ethical guidelines for particularly public officials to avoid, minimise or address conflicts of interest.

World Health Organization Research ethics committees: basic concepts for capacity building, 2009.

<https://apps.who.int/iris/handle/10665/44108>

This booklet provides a glossary of useful definitions to clarify terms used in research ethics. A framework for evaluating problems and determining the appropriate course of action is outlined.

World Medical Association Manual on Ethics, 3rd edition, 2015

https://www.wma.net/what-we-do/education/medical-ethics-manual/ethics_manual_3rd_nov2015_en/

provides a basic introduction to medical ethics and some of its central issues. It is intended to give an appreciation of the need for continual reflection on the ethical dimension of medicine, and especially on how to deal with the ethical issues in clinical practice. A list of resources is provided in the Appendix.

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