

Conflict of Interest Policy

PURPOSE

This policy provides education and guidance to the identification, disclosure and management of actual, potential or perceived conflicts of interest (COI) to protect the integrity of Pharmacy Development Australia and manage risk.

This policy aims to ensure that representatives of Pharmacy Development Australia are aware of their obligations to disclose any conflicts of interest they may have, and to comply with this policy to ensure they effectively manage those conflicts of interest.

SCOPE

This policy is applicable to all Pharmacy Development Australia office bearers, staff and those acting on behalf of Pharmacy Development Australia (e.g. Advancing Practice evaluators).

DEFINITIONS

COI arise when an individual has an actual, potential or perceived conflict between official duties and private interests (defined below).

An **actual COI** is one where there is a real conflict between the individual's official duties and responsibilities and their private interests.

A **potential COI** arises when an individual has private interests that could conflict with their official duties and responsibilities.

A **perceived COI** can exist when a third party could form the view that an individual's private interest could improperly influence the performance of their duties or responsibilities now or in the future.

Individuals may also have a **conflict of commitment** which is inherent as part of their duties and/or responsibilities with one organisation / employer conflicts with their duties and/or responsibilities with another organisation/employer.

The term **private interests** include not only the individual's own personal, professional or business interests but also the personal, professional or business interests of individuals or groups with whom they are closely associated.

Private interests can be divided into:

- **Pecuniary interests** which involve an actual, potential or perceived financial loss or gain. Money does not need to change hands for an interest to be pecuniary.
- **Non-pecuniary interests** do not have a financial component. They include any tendency toward favour or prejudice resulting from friendship, animosity or other personal involvement with another person or group.

The identification of a COI **does not imply wrong doing**. Most conflict situations can be satisfactorily dealt with through full disclosure with appropriate assessment and management.

POLICY STATEMENT

This policy has been developed because COIs commonly arise, and do not need to present a problem to Pharmacy Development Australia if they are openly and effectively managed. It is the policy of Pharmacy Development Australia as well as a responsibility that ethical, legal, financial or other conflicts of interest be avoided and that any such conflicts (where they do arise) do not conflict with the obligations to Pharmacy Development Australia.

Pharmacy Development Australia will manage conflicts of interest by requiring representatives of Pharmacy Development Australia to:

- avoid conflicts of interest where possible
- identify and disclose any conflicts of interest
- carefully manage and conflicts of interest
- follow this policy and respond to any breaches.

To help you identify, prevent or minimise impacts of, and manage COI, please refer to the Australian Charities and Not-for-Profits Commission on [Managing Conflicts of Interest](#).

Pharmacy Development Australia Directors are expected to disclose any new COIs prior to each Board meeting. Other representatives of Pharmacy Development Australia are expected to disclose any new COIs as they arise.

COMPLIANCE

All Pharmacy Development Australia office bearers, staff and those acting on behalf of Pharmacy Development Australia are responsible for the compliance and implementation of this policy.

If Pharmacy Development Australia has a reason to believe that a person subject to the policy has failed to comply with it, it will investigate the circumstances. If a person suspects that a representative of Pharmacy Development Australia has failed to disclose a COI, they may, if appropriate notify the Pharmacy Development Australia Chair. The Chief Executive Officer, and Pharmacy Development Australia staff will support the Chair in managing the process.

If it is found that this person has failed to disclose a COI, Pharmacy Development Australia may take action against them. This may include seeking to terminate their relationship with Pharmacy Development Australia.

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