



Global Centre for Preventive Health and Nutrition (GLOBE)

External Relationship Guidelines

Version 2.0

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Updates include:

Reference to updated Deakin policies (Table A1), and inclusion of reference to nicotine products and gaming

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Table of Contents

| | |
|--|----|
| Introduction..... | 3 |
| Definition of conflict of interest | 4 |
| Process for assessing and managing potential conflict of interest..... | 4 |
| Characteristics of the external party | 5 |
| Engagement type..... | 7 |
| Risk assessment matrix..... | 8 |
| Sample risk management strategies | 10 |
| Appendix 1: Relevant Deakin University Guidelines..... | 11 |
| Appendix 2: Risk/benefit assessment template | 13 |

Introduction

The Global Centre for Preventive Health and Nutrition (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 prevention, nutrition, and 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 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 can enter into through its designation as a WHO Collaborating Centre. When a project is covered by multiple guidelines and codes of conduct (including funder or partner specified) the more stringent guideline or code is to be followed where differences occur.

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 External Relationship Guidelines will be reviewed every 12 months.

Principles for engagement with organisations and individuals external to GLOBE

1. Engagement with external parties should not in any way limit academic freedom of GLOBE researchers (For example., who we work with, what studies we conduct, what methods we use, what we publish, and we publicise).
2. GLOBE's research agenda is determined based on public health priorities and policy-relevance.
3. Public health needs to be at the core of research questions.
4. Development and application of research methods are the responsibility of GLOBE researchers, in consultation with external parties where appropriate.
5. Study results will be published in ways that avoid disclosure of commercial-in-confidence information.

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>

6. For GLOBE-led projects, GLOBE researchers retain full control over the decision to publish study findings and the specific results presented. Publication decisions will not be guided by commercial considerations.
7. For GLOBE-led projects, external parties have no influence on how GLOBE publicises research findings.
8. Processes need to be established to ensure that GLOBE approves use of GLOBE/IHT/Deakin branding as part of public communications from external partners.

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 an external relations 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 External Relations Committee.

The external relations 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

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>

necessary clarifications and details. Where a member of the external relations committee is directly involved (e.g., a Chief or Associate Investigator) in the engagement under discussion, they should not be part of the relevant external relations 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).

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 External Relations 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"> <input type="checkbox"/> The tobacco industry, including: companies directly engaged in the production, manufacture, distribution, and selling of tobacco/nicotine or tobacco/nicotine products (including e-cigarettes) ⁶ <input type="checkbox"/> The alcohol industry, including: companies directly engaged in the production, manufacture, distribution, and selling of alcohol products ⁷ <input type="checkbox"/> The gambling and/or gaming industry <input type="checkbox"/> The weapons/armaments industry <input type="checkbox"/> Political parties <input type="checkbox"/> Industries substantially involved in illegal activities <input type="checkbox"/> NGOs (e.g., philanthropic organisations, community groups, think tanks) that receive a substantial degree (for example, more than 10%) of their revenue/funding from or that have substantial links (for example, through governance arrangements, registered lobbyist) to any of the above-mentioned sources |
| Tier 2 | <ul style="list-style-type: none"> <input type="checkbox"/> Food and non-alcoholic beverage manufacturers (including related associations and peak bodies), excluding those focused exclusively on fruit and vegetable products <input type="checkbox"/> 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 <input type="checkbox"/> Supermarkets and general food retailers (including related associations and peak bodies) <input type="checkbox"/> Food distributors (including food importers, exporters, aggregators and online food delivery), excluding those focused exclusively on fruit and vegetable products <input type="checkbox"/> Food growers and the agricultural industry (including related associations and peak bodies) <input type="checkbox"/> The pharmaceutical industry, including manufacturers or retailers of pharmaceuticals or medical equipment <input type="checkbox"/> Producers of weight management and/or weight loss services and products (including meal replacement products) <input type="checkbox"/> NGOs (e.g., philanthropic organisations, community groups, think tanks) that receive a substantial degree (for example, more than 10%) of their revenue/funding from, or that have substantial links (for example, 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 | <input type="checkbox"/> Food manufacturers, distributors and retailers focused exclusively on fruit and vegetable products <input type="checkbox"/> Private health service providers, health insurance companies <input type="checkbox"/> Sport and fitness clubs, and sporting goods manufacturers <input type="checkbox"/> Automobile industry, road building industry, automobile fuel companies <input type="checkbox"/> Property development companies <input type="checkbox"/> NGOs (For example, philanthropic organisations, community groups, think tanks) that receive a substantial degree (for example, more than 10%) of their revenue/funding from or that have substantial links (for example, through governance arrangements, registered lobbyist) to any of the above-mentioned sources |
| Tier 4 | <input type="checkbox"/> Government departments, public authorities and government agencies <input type="checkbox"/> Universities and research institutes <input type="checkbox"/> 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 External Relations 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 External Relations 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 External Relations 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 External Relations | Prepare risk/benefit assessment (Appendix 2) for approval by GLOBE Director (or equivalent) who can seek | 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

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| <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>Committee for assessment, approval needed from GLOBE Director (or equivalent)</p> | <p>advice from or delegate to GLOBE External Relations 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 External Relations 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 regard 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: [Declaration 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 interest, 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>Research Conduct Policy-Social Responsibility</p> <p>These are the relevant extracts from the full policy which can be found here.</p> | <p>The University is committed to supporting a culture and environment that promotes and fosters the responsible conduct of research.</p> <p>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.</p> <p>The University will not engage in research that leads to the proliferation of military end use goods or weapons of mass destruction and adhere to Australia's export controls, as proscribed by the Defence Trade Controls Procedure.</p> <p>The University will implement measures to ensure adherence to the United Nations Security Council (UNSC) sanctions regimes and Australian autonomous sanctions regime.</p> |
| <p>Research Conduct Policy-Responsible Research Conduct</p> <p>These are the relevant extracts from the full</p> | <p>(13) Researchers will foster and support a research culture of honesty, respect, accountability, and transparency through compliance with all relevant laws, regulations, disciplinary standards, ethical guidelines and institutional policies related to responsible research conduct.</p> <p>(14) In demonstrating responsible research conduct, researchers will:</p> |

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| <p>policy which can be found here.</p> | <p>a. adhere to the principles and responsibilities of Australian Code for the Responsible Conduct of Research 2018 and the University's research integrity standards.</p> <p>d. ensure appropriate approvals are obtained prior to commencement of research and adhere to the relevant Procedures if their research involves:</p> <p>vii. partnerships with organisations that require Commonwealth approval under the Australia's Foreign Relations (State and Territory Arrangements) Act 2020</p> <p>j. disclose and manage any actual, potential or perceived conflicts of interest relevant to their proposed or ongoing research according to the Declaration of Interest procedure.</p> |
| <p>External Relationships and Partnerships policy</p> <p>These are the relevant extracts from the full policy which can be found here.</p> | <p>Prohibited Partnerships</p> <p>(15) Consistent with the University's values and strategic objectives, the University will not enter into partnerships with entities from the following industries:</p> <ol style="list-style-type: none"> 1. tobacco, being any entity that directly or primarily engages in the production, manufacture, sale, promotion or marketing of nicotine, tobacco or tobacco products as their primary business or an entity that is funded primarily by the tobacco industry; or 2. gambling and gaming. <p>(16) Partnerships with entities that operate primarily within the alcohol industry will be considered on a case-by-case basis and may only proceed with the written approval of the Vice-Chancellor, with input from other relevant Executive members.</p> <p>International Partners</p> <p>(17) Any partnership that involves an international partner, whether under clauses 8 or 11-12, must comply with the International Relations Regulation policy. When proposing a new partnership or managing a current partnership, staff should consider the rules and guidance provided under that policy.</p> |

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 | |