



## 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 The Society of Hospital of Pharmacists of Australia (SHPA) and manage risk.

This policy aims to ensure that representatives of SHPA are aware of their obligations to disclose any conflicts of interest that 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 SHPA office bearers, staff, and members and those acting on behalf of SHPA. They are: Board of Directors, members of the Board committees and Reference Groups, Branch office bearers, Speciality Practice Group and Leadership Committee members, SHPA staff, conference organising committees and members involved in the planning and delivery of SHPA activities.

### **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 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 SHPA if they are openly and effectively managed. It is the policy of SHPA as well as a responsibility of the SHPA Board, 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 SHPA.

SHPA will manage conflicts of interest by requiring representatives of SHPA to:

- avoid conflicts of interest where possible
- identify and disclose any conflicts of interest
- carefully manage any conflicts of interest, and
- 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](#).

Once an actual, potential or perceived COI is identified, representatives of SHPA will complete a COI Disclosure Form (Appendix A) to be reviewed by the Chief Executive, President, or HR.

This will be entered into the SHPA Register of Interests, as well as being raised with the SHPA Chief Executive/Company Secretary. The SHPA Register of Interests must be maintained by HR, and record information related to a COI (including the nature and extent of the conflict of interest and any steps taken to address it).

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

## Compliance

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

If SHPA 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 SHPA has failed to disclose a COI, they may, if appropriate notify the Chair of the relevant branch or working group (affected body). The Chief Executive, President, or HR will support the Chair in managing the process.

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

Approved by	CEO (KM)
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Intended audience	SHPA staff, Directors, Branch Committee members, contractors, consultants, volunteer members working on SHPA events, projects or activities and any other representative of SHPA
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