# **Conflict-of-Interest policy**

# A. Purpose of the Conflict-of-Interest Policy

- 1. The objective of the Independent Panel on Evidence for Action against Antimicrobial Resistance ('the Panel') is to assess and facilitate the generation and use of multisectoral, policy-relevant scientific evidence to support Member States at all levels in their efforts to tackle antimicrobial resistance (AMR) applying a One Health approach, making use of existing resources and avoiding duplication of ongoing efforts.
- 2. The role of the Panel requires that it pays special attention to issues of scientific independence and conflicts of interest in order to maintain the integrity, credibility, relevance and legitimacy of, and public confidence in, its outputs and processes. It is essential that the work of the Panel is not compromised by any conflict of interest. The overall purpose of this policy is to protect the Panel from any conflict of interest.
- 3. The Panel recognizes the commitment and dedication of those who participate in its activities and the need to maintain a balance between minimising the reporting burden, and ensuring the integrity of the Panel and its deliverables. In this way, this policy seeks to encourage participation and to ensure that the representativeness and geographic, regional, and gender balance of the Panel is not impaired, while continuing to build and maintain public trust. This policy provides an overarching framework but does not offer an exhaustive list of criteria for identifying conflicts of interest, it allows flexibility in implementation as understanding and context evolve over time.
- 4. This Conflict-of-Interest Policy is designed to ensure that conflicts of interest are identified, prevented and managed to avoid any adverse impact on the Panel's independence, deliverables and processes, thereby protecting the person or persons concerned, the Panel, and the public interest.
- 5. It is essential to avoid a situation in which a reasonable person could question, discount or dismiss the work of the Panel owing to the perception of a conflict of interest. It is recognized that the privacy and professional reputation of individuals must be respected. Identifying a potential conflict of interest does not automatically mean that a conflict of interest exists.

#### B. Scope of the Conflict-of-Interest Policy

- 6. This policy applies to all parts of the Panel, including members of the Expert Committee and any subsidiary groups contributing to the development of deliverables, and to non-United Nations staff and partnerships supporting the Panel's work.
- 7. The policy applies to the development of all Panel deliverables.
- 8. The staff members of the Panel's Secretariat who are employees of the Quadripartite organizations are subject to their respective organization's disclosure and ethics policies, as well as code of conduct, which include conflict of interest.

#### C. Definition of Conflicts of Interest

- 9. A "conflict of interest" refers to any professional, financial, or other non-financial interest from the past four years which could:
- (a) significantly impair the individual's objectivity in carrying out their duties and responsibilities for the Panel, or
  - (b) create an unfair advantage for any person or organization.

For the purposes of this policy, circumstances that could lead a reasonable person to question an individual's objectivity, or whether an unfair advantage has been created, constitute a potential conflict of interest. These potential conflicts are subject to disclosure.

10. "Conflict of interest" should be distinguished from "bias," which refers to a point of view or perspective that is strongly held regarding a particular issue or set of issues, but does not stand to gain. In the case of author and review teams, bias can and should be managed through the selection of a balance of perspectives. Bias can also be managed through other means, including a rigorous peer review. For example, it is expected that Panel author teams will include individuals with different perspectives and affiliations. Those involved in selecting authors will need to strive for an author team composition that reflects a balance of expertise and perspectives, such that Panel deliverables are comprehensive, objective, and policy relevant without being policy prescriptive. In selecting these

individuals, care must be taken to ensure that biases can be balanced where they exist. In contrast, conflict of interest exists where an individual, or an organization, could secure a profession, financial or other non-financial gain through outcomes of a Panel process or deliverable.

- 11. The conflict-of-interest requirements in this policy are not designed to include an assessment of one's behaviour or character or one's ability to act objectively despite the conflict of interest.
- 12. This policy does not apply to past interests that have expired, no longer exist, and cannot reasonably affect current behaviour. Nor does it apply to possible interests that may arise in the future but that do not currently exist, as such interests are inherently speculative and uncertain. For example, a pending application for a particular job is a current interest, but the mere possibility that one might apply for such a job in the future is not a current interest.
- 13. Any significant and relevant interests that would constitute a real, potential or apparent conflict of interest must be disclosed. If in doubt about whether an interest should be disclosed, individuals are encouraged to seek advice from the Secretariat. Significant and relevant interests may include, but are not limited to consulting relationship, membership of advisory committees associated with private sector, memberships of the boards of non-profit or advocacy groups, financial investments, intellectual property interests, commercial interests, sources of research support, personal relationships, and competition for recognition, funding, or publication. Significant and relevant interests may also include those relevant interests of parties with whom an individual has a current contractual relationship or substantial common interests and which could be perceived as unduly influencing, or likely to unduly influence, the individual's judgement (for example their employer(s), close professional associates, their administrative unit or department, sponsoring or funding entities). Individuals should also disclose significant and relevant financial interests of any person with whom the individual has a substantial business or relevant shared interest.
- 14. To prevent situations in which a conflict of interest may arise, individuals directly involved in the preparation of Panel deliverables should avoid being in a position to clear (approve or accept), on behalf of any government or organization, the text in which they were directly involved.

# **D.** Implementation Procedures

15. Compliance with the COI Policy and Implementation Procedures is mandatory. Where a conflict of interest is identified, a person may only proceed to participate in Panel activities if action is undertaken that the conflict of interest is properly managed.

#### a. Expert Committee members: review process prior to appointment

16. The Conflict-of-Interest Disclosure Form ("the COI Form") contained in the Annex to this COI Policy will be submitted to the Secretariat in respect of each nominee for members of the Expert Committee of the Panel. The Secretariat will review the COI Forms. Where the Secretariat determines that a nominee for the Expert Committee membership has a conflict of interest that cannot be resolved, the individual will not be eligible for the Expert Committee.

#### b. Expert Committee members: review process after appointment

17. All members of the Expert Committee will inform the Secretariat of any changes in the information provided in their previously submitted COI Form as they arise. The Secretariat will review the updated information, determine whether the relevant member has a conflict of interest that cannot be resolved and determine what further action is necessary in accordance with this COI Policy and in consultation with the Co-Chairs and Vice Co-Chairs of the Expert Committee members, excluding any individuals directly involved.

# c. Members of any subsidiary groups: review process prior to appointment

- 18. Before an individual is appointed to a role under any subsidiary group, the Secretariat will request the individual to complete the COI Form. Before an individual can take on the role in question, the Secretariat will evaluate the form to determine whether the individual has a conflict of interest that cannot be resolved.
- 19. In exceptional circumstances and in consultation with the Co-Chairs and Vice Co-Chairs of the Expert Committee, a conflict of interest on the part of an individual which cannot be resolved may be tolerated where the individual is deemed to provide a unique contribution to a Panel deliverable and where it is determined that the conflict can be managed such that it will not have an adverse impact on

the relevant Panel deliverable. In such cases, the Secretariat will publicly disclose the conflict and the reasons for determining that the individual may continue to contribute to the Panel's work in spite of the conflict.

#### d. Members of any subsidiary groups: review process after appointment

20. All members of any subsidiary groups will inform the Secretariat of any changes in the information provided in their previously submitted COI Form as they arise. The Secretariat will review the updated information, determine whether the individual has a conflict of interest that cannot be resolved and determine what further action is necessary in accordance with this COI Policy and in consultation with the Co-Chairs and Vice Co-Chairs of the Expert Committee.

#### e. Other subsidiary groups: exceptions

- 21. Notwithstanding paragraphs 19 and 20, an individual may decline to disclose information related to specific activities, interests and funding where its disclosure would adversely and materially affect:
  - (a) Defense, national security or imminent public safety;
  - (b) The course of justice in prospective or current court cases;
  - (c) The ability to assign future intellectual property rights; or
  - (d) The confidentiality of commercial, government, or industrial information.
- 22. Individuals who decline to disclose specific information in accordance with paragraph 21 must declare that they are doing so in their disclosure of interest under paragraphs 19 or 20, and must be completely excluded from relevant work.

#### Principles for Identifying and Managing Conflict-of-Interest Issues

- 23. The Secretariat should consult the relevant individual where it has concerns about a potential conflict of interest and/or where it requires clarification of any matters arising out of a COI Form and should ensure that the relevant individuals and, where appropriate relevant nominator, have an opportunity to discuss any concerns about a potential conflict of interest.
- 24. Where the Secretariat has determined that an individual has a conflict of interest that cannot be resolved, the relevant individual may request the Co-Chairs and Vice Co-Chairs of the Expert Committee, excluding any individuals directly involved, to review the Secretariat's determination. The individual will be bound by the determination of the Secretariat pending the outcome of the review.
- 25. When considering whether an individual has a conflict of interest, the Secretariat will, in consultation with the individual, explore options for resolving the conflict. Individuals might, for example, resolve a conflict of interest by divesting themselves of the particular financial or other interests which gave rise to the potential conflict or by recusing themselves from discussions or decision-making processes in respect of which they have a relevant conflict.

#### **Processing and Storage of Information**

- 26. All COI Forms and any records of the deliberations and decisions in relation to conflict-of-interest issues in respect of specific individuals and any information disclosed by individuals for the purposes of the COI Policy will be securely archived by the Secretariat and retained for a period of five years after completion of their term or completion of the deliverable to which the relevant individual contributed, after which the information will be destroyed. Subject to the requirement to notify the existence of a conflict of interest to others under paragraph 24 above, the information referred to above will be considered confidential and will not be used for any purpose other than consideration of conflict-of-interest issues under these Implementation Procedures without the express consent of the individual providing the information.
- 27. The Secretariat should submit a report on its activities in implementing the COI Policy to the Expert Committee at least four weeks before each session. Issues of confidentiality will be addressed by the Secretariat as early as possible.

# **Annex to the Conflict-of-Interest Policy**

# Conflict of Interest Disclosure Form ("COI For") for the Independent Panel on Evidence for Action against Antimicrobial Resistance (IPEA)

# **Confidential**

Name:
Address:
Email address:
Telephone no.:
Current employer:
Function/role in the Panel:

You have been invited to serve on the Independent Panel on Evidence for Action against Antimicrobial Resistance (IPEA) (hereinafter referred to as "the Panel") because of your professional standing and expertise. As is outlined in the Panel's Conflict--of--interest Policy, the objective of the Panel requires special attention to issues of scientific independence and conflicts of interest in order to maintain the integrity, credibility, relevance and legitimacy of, and public confidence in, its outputs and processes. It is essential that the work of the Panel is not compromised by any conflict of interest; as a result, disclosure of certain circumstances is necessary. When you are filling out this form, we rely on your professionalism, common sense and honesty.

The disclosure of significant and relevant interests is required as a matter of due diligence so as to provide appropriate assurance to the Panel with regard to matters of conflicts of interest, ensure professional and scientific integrity, and protect the Panel and its participants from reputational risk.

The disclosure of significant and relevant interests is required in accordance with the Panel's conflict-of-interest policy and implementation procedures. You should disclose interests that could: (a) significantly impair your objectivity in carrying out your duties and responsibilities for the Panel; or (b) create an unfair advantage for you or any person or organization, and which could result in your securing a profession, financial or other non-financial gain through outcomes related to a Panel process or deliverable.

In accordance with the Conflict-of-interest Policy, circumstances that could lead a reasonable person to question your objectivity or ask whether an unfair advantage has been created constitute a potential conflict of interest and should be disclosed on this form.

You must also declare any relevant interests of parties with whom you have current contractual relationships or substantial common interests and which could be perceived as unduly influencing, or likely to unduly influence, your judgment (e.g. your employers, close professional associates, administrative unit or department, any sponsoring or funding entities).

A brief description should be provided in relation to the questions outlined below. You should aim to provide sufficient and explicit information to allow the Panel to form a view on whether the circumstances disclosed give rise to an actual or potential conflict of interest.

Once completed, please sign and date the form in the space provided and return it to the Secretariat of the Panel, along with a curriculum vitae and information supporting the disclosures made, where applicable. Please retain a copy for your records.

You must promptly inform the Secretariat of the Panel of any change concerning the information provided prior to or during the course of your work or meetings for the Panel. This form and the declarations contained therein must be completed before participation in the Panel activity can be confirmed.

Answering "yes" to a question on this form does not necessarily mean that a conflict is present or that you will be unable to perform your designated function or role in the Panel. If in doubt about whether an interest should be disclosed, individuals are encouraged to disclose that information. The information will be assessed as a whole on the basis of the Conflict-of-interest Policy. If individuals

have questions about the process of completing this disclosure form, they are encouraged to seek advice from the Secretariat of the Panel.

#### Definition of "conflict of interest":1

A "conflict of interest" refers to any professional, financial, or other non-financial interest from the past four years which could:

- (a) significantly impair the individual's objectivity in carrying out their duties and responsibilities for the Panel, or
  - (b) create an unfair advantage for any person or organization.

For the purposes of this policy, circumstances that could lead a reasonable person to question an individual's objectivity, or whether an unfair advantage has been created, constitute a potential conflict of interest. These potential conflicts are subject to disclosure.

## Part I. Commercial and financial interests

1	Do you hold any position or appointment or have any business or professional relationships with other bodies related to science on AMR?  Details:	Yes	No
2	Do you receive any remuneration (e.g. employment or consulting, including services as a technical or other adviser) from a commercial entity or other organization with an interest related to the subject of the Panel's work in which you are engaged?	Yes	No
	Details:		
3	Do you receive financial support from any commercial entity or other organization with an interest related to the subject of the Panel's work (e.g. a government agency)?		
	(a) Research support, including grants, collaborations, sponsorships, other funding	Yes	No
	Details:		
	(b) Support, including honorariums, for being a panellist, giving speeches or providing training to a commercial entity or other organization with an interest related to the subject of the Panel's work?	Yes	No
	Details:		
4	Do you have investments in any commercial entity with an interest related to the subject of the Panel's work? (Please also include indirect investments such as a trust or holding company. You may exclude mutual funds, pension funds or similar investments that are broadly diversified and over which you exercise no control.)		
	(a) Stocks, bonds, stock options, other securities (e.g. short sales)	Yes	No
	Details:		
	(b) Commercial business interests (e.g. ownership, partnerships, joint ventures, board memberships, controlling interests)	Yes	No
	Details:		
5	Do you own any intellectual property rights that might be affected by the Panel's work?		
	(a) Patents, trademarks or commercial copyrights (including pending applications)	Yes	No

<sup>&</sup>lt;sup>1</sup> Definition taken from section C of the Panel's conflict-of-interest policy, which is available at [URL to be inserted].

# **Details:**

	<ul> <li>(b) Proprietary knowledge of a technology or process being used for commercial purposes</li> </ul>	Yes	No
	Details:		
6	Do you hold any financial interests in excess of US\$10,000 per year which outside parties could consider might represent or give rise to a conflict of interest, or the perception of a conflict of interest, with regard to your Panel service?  Details	Yes	No
7	As part of a regulatory, legislative or judicial process, are you providing any expert opinion or testimony related to the subject of the Panel's work for a commercial entity or other organization?  Details:	Yes	No
Part 1	II. Professional and other non-financial interests		
8	Do you hold any position or appointment or have any business or professional relationships with other bodies related to science on AMR?  Details:	Yes	No
	Details.		
9	Do you receive non-financial support valued in excess of US\$10,000 per year (e.g. premises, equipment, facilities, assistants, paid travel, etc.) from any commercial entity or other organization with an interest related to the subject of the Panel's work (e.g. a government agency)?	Yes	No
	Details:		
10	As part of a regulatory, legislative or judicial process, are you providing any expert opinion or testimony related to the subject of the Panel's work for a commercial entity or other organization?	Yes	No
	Details:		
11	Are you engaged in any professional or other activities which outside parties could consider might represent or give rise to a conflict of interest, or the perception of a conflict of interest, with regard to your Panel service?	Yes	No
11	Details:		
	Are you involved in any of the following:		
	(a) Official function in a government agency or international organization?	Yes	No
	Details:		
	(b) Advisory committee associated with a public or private sector organization?	Yes	No
	Details:		
	(c) Senior editorial role or assignment?	Yes	No
	Details:	res	110
	Do you serve as any of the following:		
	(d) Board member of a public or private sector organization?	Yes	No
	Details:		
	(e) Board member of a non-profit organization?	Yes	No
	Details:		

	(f) Board member of an advocacy group?  Details:	Yes	No
Part 1	III. Additional information		
12	If not already disclosed above, are you aware of any aspect of your work for the Panel that will enable you to obtain access to proprietary information or create for you a competitive advantage in your professional, financial or business dealings?	Yes	No
	Details:		
13	To your knowledge, could the outcome of your work for the Panel adversely affect the interests of any other persons or entities with whom you have substantial common personal, professional, financial or business interests (such as your adult children or siblings, close professional colleagues, administrative unit or department)?	Yes	No
	Details:		
14	Which organization is covering, in part or in full, your Panel-related travel costs?		
	Details:		
15	Are you receiving any payments (other than for travel costs) or honorariums for speaking publicly on the subject of the Panel's work in which you are engaged?	Yes	No
	Details:		
16	Is there any other aspect of your background or present circumstances not addressed above that you consider might be perceived as affecting your objectivity or independence?	Yes	No
	Details:		
	Signature:		
	Date:		