



## 8.9 Annex to appendix 8.5 – Conflict-of-interest policy

The Evidence Commission developed a conflict-of-interest policy that involved three elements:

- completion of a disclosure form by commissioners and key secretariat staff
- screening of these disclosure forms by a member of the secretariat (Jennifer Thornhill Verma) using a risk-assessment model (and if issues arose, by an arm's-length advisor)
- committee comprised of two independent conflict-of-interest experts to review any concerns raised through the screening process and propose a risk-management plan.

This disclosure form, risk-assessment model and risk-management process were developed with guidance from Lisa Bero, and informed by empirical research on conflict-of-interest management.(76-78)

The disclosure form was as follows:

**Employment** – describe current employment (add more lines if more than one in past five years)

Position in and name of employer:	
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**Financial interest** – disclose support only from entities that could be affected financially by the Evidence Commission report and that were received in the five years before this form is completed (note that public funding sources, such as government agencies or academic institutions, need not be disclosed)

Type of interest	Source of funding <i>(e.g., foundation X)</i>	Period of activity <i>(e.g., whether current and date range)</i>	Nature of activity <i>(e.g., speaking fee, project grant) and focus (e.g., report title or product name)</i>	Value of payment <i>(in CDN\$)</i>
Company ownership <i>(e.g., stock holdings or options)</i>				
Intellectual property <i>(e.g., licences and patents) fees and royalties</i>				
Board (or advisory board) member retainer, honoraria, etc.				
Contracts or grants to undertake projects				
Consulting or advising fees, honoraria, etc.				
Speaking or authorship fees, honoraria, etc.				
Meeting attendance <i>(e.g., participation, travel or meals) costs paid</i>				
Other private practice or professional income				
In-kind support				
Family member with any of the above financial interests				

**Organizational interest** – disclose relationships with additional organizations (i.e., not meeting the criteria above) that have a pecuniary or non-pecuniary interest in the Evidence Commission report and that were held in the five years before this form is completed

Type of interest	Type of relationship <i>(e.g., employment, leadership position or member)</i>	Description
Relationship with organizations with financial links or other affiliations with industry groups that stand to benefit from or may be affected by the Evidence Commission report <i>(e.g., professional society)</i>		
Relationship with organizations that advocate known industry or policy positions		
Family member with either of the above organizational interests		

**Other**

Are there any other relevant interests, factors or circumstances not addressed above?	
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**Additional information**

Is there any additional information you would like to provide relating to the above declaration of interests?	
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The risk-assessment model involved consideration of the following factors:

- context and relevance to the work of the Evidence Commission
- nature of relationship (financial, personal, relevance)
- amount of relationship (financial)
- duration of relationship
- number of relationships (e.g., financial ties with a single company or many companies)
- type of company (relevance to the work in question and whether it could profit if recommendations are favourable; reputational risk)
- direct or indirect payments (e.g., to person or institution)
- level of control (e.g., company board member versus one-off consultant)
- risk of bias (e.g., in making recommendations).

The risk-management plan considered:

- risk level (high, medium or low)
- management options, which included:
  - strategies to eliminate conflicts (e.g., good-faith effort by the secretariat to identify commissioners with no conflicts; prospective candidates do not agree to become a commissioner or eliminate all financial ties)
  - strategies to mitigate conflicts (e.g., commissioners and secretariat staff members to not participate in related discussion, in drafting or revising sections or recommendations, or in voting or ratifying recommendations).

The resulting model took the following form:

Risk level	Considerations	Examples	Management
High	<ul style="list-style-type: none"> <li>Relevant, personal, financial – large amount, long duration, control</li> <li>Many relationships</li> <li>Reputational risk</li> </ul>	<ul style="list-style-type: none"> <li>Company employee</li> <li>Long-term consultant</li> <li>Board member</li> <li>Spouse is company employee</li> <li>Ties with company with reputational risk</li> </ul>	<ul style="list-style-type: none"> <li>Do not participate in committee</li> <li>Eliminate conflict of interest</li> <li>Cannot be chair</li> <li>Committee balance</li> </ul>
Medium	<ul style="list-style-type: none"> <li>Relevant, personal, financial – small amount, short duration, minimal control</li> <li>Few relationships</li> <li>Reputational risk</li> </ul>	<ul style="list-style-type: none"> <li>Consulting, honoraria, travel</li> <li>Child works as clerk for company</li> <li>Grants from company</li> </ul>	<ul style="list-style-type: none"> <li>Restrictions on participation</li> <li>Cannot be chair</li> <li>Eliminate conflict of interest</li> <li>Committee balance</li> </ul>
Low	<ul style="list-style-type: none"> <li>No personal financial relationships, no control</li> </ul>	<ul style="list-style-type: none"> <li>Grant to institution from company</li> <li>Published articles in The Conversation on relevant topic</li> <li>Testified before government committees</li> </ul>	<ul style="list-style-type: none"> <li>Full participation or some restriction</li> </ul>
None	<ul style="list-style-type: none"> <li>As above</li> </ul>	<ul style="list-style-type: none"> <li>Academic publications only – examples of expertise, not conflict of interest</li> </ul>	