

TGL conflict of interest policy

Independence is a critical issue for Therapeutic Guidelines Limited (TGL) as its reputation is staked on the integrity of its publications. Independence is relevant to TGL both at an organisational level and in the development of therapeutic information by its expert groups.

TGL's independence as an organisation is founded on being financially self-sufficient. TGL derives an income solely from the sale of its products, and receives no direct funding from government or commercial organisations, including the pharmaceutical industry. TGL also requires all those involved in the company at an organisational level—Directors, members of the company, and staff—to adhere to the conflict of interest policy outlined below.

Comprehensive declaration and management of conflicts of interest is crucial to the publication of independent therapeutic advice. In recognition of this, TGL also requires members of expert groups and external reviewers to adhere to the conflict of interest policy outlined below.

Directors, members of the company and staff

Directors, members of the company and staff are appointed on the basis of their expertise and interest in the core activities of TGL, in particular the promotion of quality use of medicines through the publication of independent therapeutic guidelines.

Before appointment, Directors, members of the company and staff must provide the Chair of the Board or the Chief Executive Officer with a written interest statement (see section below). It is the individual's responsibility to identify and disclose any interests they or their associates¹ might have relating to the role they are undertaking for TGL. It is also the individual's responsibility to identify and disclose any relationships or connections they might have with other boards, committees or organisations that could affect the integrity and reputation of TGL.

If a Director, including the Chair, has an interest with regard to any issue for consideration by the Board at a meeting, a statement to this effect must be provided by the relevant Director before any discussion takes place on that issue. If, in the opinion of the Chair, a conflict of interest exists that imperils the independence of the decision-making progress, the Chair may request that the Director concerned absents him/herself from the meeting. If the Director concerned is the Chair, the remaining Directors may request that the Chair absents him/herself from the meeting.

Directors, members of the company and staff must provide the Chair of the Board or the Chief Executive Officer with an updated written interest statement whenever changes occur.

¹ An associate refers to a family member, business associate or professional colleague.

The register of Directors' declared interests is reviewed on a quarterly basis and published on the TGL website <www.tg.org.au>.

Expert group members

Expert group members are appointed on the basis of their:

- clinical or academic expertise in the therapeutic area under review,
- interest in the quality use of medicines, and
- integrity in providing independent and objective advice.

When composing expert groups, TGL aims to incorporate a diversity of expertise, perspective and opinion in the therapeutic area under review.

Before appointment to an expert group, individuals must provide the Chief Executive Officer with a written interest statement (see section below). It is the individual's responsibility to identify and disclose any interests they or their associates² might have relating to the role they are undertaking for TGL. It is also the individual's responsibility to identify and disclose any relationships or connections they might have with other boards, committees or organisations that could affect the integrity and reputation of TGL.

TGL endeavours to appoint a Chair for the expert group and expert group members without conflicts of interest. However, if this is not possible, TGL will ensure that members with conflicts of interest represent a minority of the expert group and that any declared interests are balanced through careful composition of the expert group.

At the initial (planning) meeting of the expert group, each member is asked to explain how his/her declared interests could influence the guideline recommendations. Before each expert group meeting, a register of declared interests is distributed to expert group members so members are aware of each other's interests and can take this into account during the revision process.

At the start of each meeting, the expert group and the Chair determine whether any member has a conflict of interest that is relevant to the day's agenda and, if so, how this should be managed. A member may be asked by the Chair to absent him/herself from the meeting while the expert group deliberates and makes its determination in regard to that member's declarations. The member's exclusion and the deliberations of the expert group are recorded in the minutes. If a group member is concerned that a conflict of interest has been inappropriately managed at an expert group meeting, this can be referred to the TGL Board through a confidential communication to the Chief Executive Officer.

Members must inform the expert group if there are changes to their declared interests throughout the duration of the project and these changes will be recorded in the register. In the unlikely event that a member withdraws from the expert group before the completion of the project, their declared interests will still be recorded in the register and their withdrawal from the group will be noted.

The register of expert group members' declared interests is published on the TGL website <www.tg.org.au> at the time the relevant clinical content is published.

External reviewers

The process for declaration and management of interests for external reviewers is similar to that for expert group members. If the expert group agrees that external review is required for a particular topic, then the external reviewer must submit a declaration of interests before participating.

² An associate refers to a family member, business associate or professional colleague.

Interest statements

Interest statements must comprise a declaration of any interests an individual or their associates³ might have relating to the role the individual is undertaking for TGL. Interest statements should also include any relationships or connections the individual might have with other boards, committees or organisations that could affect the integrity and reputation of TGL.

Interests may be academic, professional, commercial or personal, and may be financial or non-financial. Associations may be with government or any company that stands to gain from the inclusion of any product (or its competitor) in the guidelines. Planned and current interests, as well as interests within the past five years, should be declared if relevant. TGL provides individuals with an interest statement form to assist in providing a comprehensive declaration.

Registers of Directors', expert group members' and external reviewers' declared interests are published on the TGL website <www.tg.org.au>.

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³ An associate refers to a family member, business associate, or professional colleague or partner.