

Conflict of Interest and Declarations of Interest

The Health Intervention and Technology Assessment Program Foundation (HITAP Foundation) is committed to conducting our activities with integrity, independence and impartiality, prioritising the public interest. Decision-making and operations are carried out without personal interests that could lead to conflicts of interest. Additionally, the HITAP Foundation maintains a policy of not accepting financial support directly from private sectors that are, or may become, involved in our work. It is essential for all board members and employees of the HITAP Foundation to adhere to this principle and disclose any involvements with the private sector.

To ensure independence and impartiality, the HITAP Foundation has developed a Conflict of Interest (COI) policy and declaration process, based on a review of relevant documents published by national and international organisations in similar fields (refer to *the Summary of COI policies in Appendix 1*). This policy is reviewed every three years by the Head of the Administration Unit and the Human Resources team, with approval from the Assistant Secretary-General and the Secretary-General of the HITAP Foundation.

All board members and employees of the HITAP Foundation are required to complete a Declaration of Interest form to disclose any potential or perceived conflicts of interest prior to appointment/employment, annually, and whenever circumstances change. If a declared interest is determined to be potentially or clearly significant, one or more of the following measures may be applied:

- Full participation in the HITAP Foundation's activities with disclosure of interests.
- Partial exclusion from certain activities or decision-making processes.
- Total exclusion if the conflict is deemed too significant to mitigate.

The purpose of the declaration is to ensure that interests are disclosed and managed appropriately, not to restrict engagement with external organisations or terminate appointments due to conflicts of interest. Individuals are encouraged to consult the unit head, the Assistant Secretary-General, or the Secretary-General if they are uncertain about whether to disclose an interest.

1. What is a Conflict of Interest?

A Conflict of Interest arises when personal interests—whether financial, personal, or otherwise unrelated to the HITAP Foundation—interfere with, or could be perceived to interfere with, individual's ability to act impartially and in the best interests of the HITAP Foundation. The types of interests that may need to be disclosed include:

1. Financial Interests

This relates to any direct financial benefit to board members or employees, including all forms of monetary value such as:

- Salary and payments for services.
- Equity interests, including stocks, stock options, or other ownership interests.
- Intellectual property rights, including patents, copyrights and royalties.

Examples of direct financial interests include:

- Paid employment in a role relevant or potentially relevant to one's role at the HITAP Foundation, including in the private sector.
- Work in the private sector, such as a directorship or consultancy, that provides regular or occasional payments or benefits in kind.

- Direct payments from the private sector to attend a meeting, conference, or event beyond reasonable travel, accommodation and attendance costs.
- Shareholdings or other investments in the private sector (excluding investments in managed funds where you do not control the fund manager).
- Personal payment from the private sector to undertake research.

While benefits from non-profit organisations do not constitute a potential conflict of interest, this information will be recorded for reference.

2. **Non-financial Interest**

This relates to any non-financial professional or personal benefit or issues that could affect individual's perceived objectivity, integrity and independence. Examples include:

- Advocacy for a specific group or affiliation with a lobbying or pressure group focused on healthcare.
- Holding an office or a position of authority in a professional organisation that is involved, or may become involved, in the HITAP Foundation's work, such as a university, charity, or advocacy group.
- Participation in an ongoing or scheduled trial or research project related to the effectiveness of the matter under review.
- Having published a clear opinion on the matter under consideration.

3. **Indirect Interests**

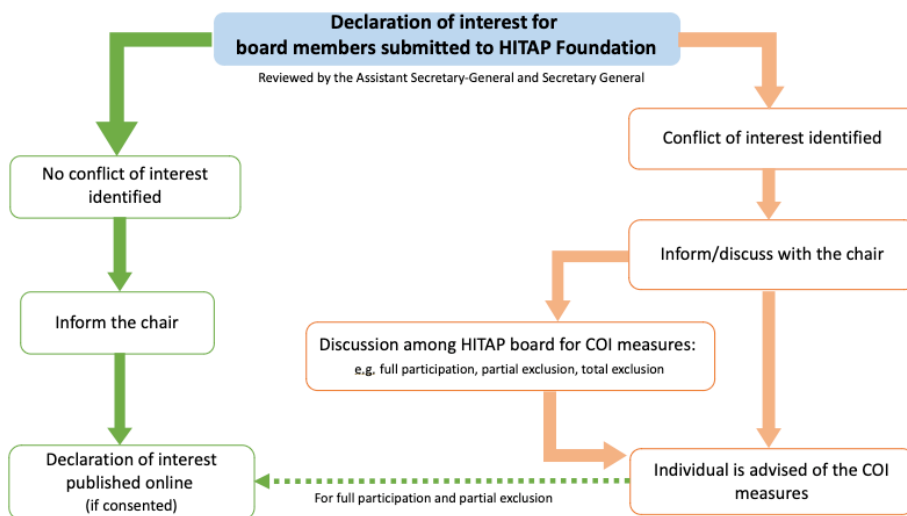
This relates to circumstances where there is, or could be perceived to be, an opportunity for a third party closely associated with board members or employees to gain a benefit. Such benefits might arise through another person or organisation having a financial or non-financial interest, and potentially benefiting from a decision one may influence. This can include:

- Close relatives, close friends, associates and business partners.
- Employers, including those providing research grants or other funding.
- Situations where one is appointed as a committee member to represent an organisation.
- Situations where one attend a meeting to speak on behalf of an organisation.

2. Declaration of Interest process

The HITAP Foundation requires that all board members and employees to complete a Declaration of Interest form to disclose any potential or perceived conflicts of interest before appointment/employment, annually, and whenever circumstances change. This requirement aims to ensure the highest standard of integrity and maintain public confidence in the work conducted by the HITAP Foundation.

Board members are required to submit *the Declaration of Interest form* to the Assistant Secretary-General and the Secretary-General of the HITAP Foundation for review. If a declared interest is considered potentially significant, it will be assessed in consultation with the Chairperson. Where necessary, a meeting may be held to determine appropriate measures, ensuring fairness and transparency among board members.



Declaration of interest process for board members

Employees are required to submit the *Declaration of Interest form* to the Human Resource Officer of the HITAP Foundation for review. If a declared interest is considered potentially significant, it will be assessed in consultation with Assistant Secretary-General or Secretary-General to determine appropriate measures.

Once the Declaration of Interest form is submitted, it will be retained by the HITAP Foundation for a period of one year (after the end of the assessment cycle, provided it is concluded that no potential conflict exists or that the interest is deemed irrelevant or insignificant), after which the information will be removed or destroyed.

3. Managing Conflicts of Interest

While avoiding conflicts is generally preferable, there may be situations in which such conflicts cannot be entirely avoided and must instead be managed in a manner that will withstand external scrutiny. The actions taken to mitigate or eliminate a conflict of interest will depend on the specific situation, including the role and responsibilities of the employee or board member within the HITAP Foundation. Without limiting the potential action that may be taken, conflicts of interest may be managed in the following ways:

- Full participation in the HITAP Foundation's activities with disclosure of interests.
- Partial exclusion from certain activities or decision-making process.
- Total exclusion if the conflict is deemed too significant to mitigate.

4. Avoiding Conflicts of Interest

Family connections or personal relationships that may influence, or appear to influence, one's impartiality should be avoided in order to maintain the integrity of professional advice. The acceptance of gifts, entertainment, hospitality, or honours related to HITAP Foundation duties should be approached with caution, as it may create a sense of obligation to the giver, potentially affecting the Foundation's reputation for independence, integrity, and impartiality. Soliciting gifts or favours in connection with HITAP Foundation duties is strictly discouraged. Gifts offered should not be accepted if doing so could suggest impropriety, bias, or would call into question the independence and reputation of the HITAP Foundation. However, for gifts with a

total value of less than USD 30, board members or employees may exercise discretion while prioritising the foundation's reputation.

Appendix

Appendix 1: Summary of COI Policies

The COI working team conducted a review of relevant documents regarding COI policies and process published by national and international organisations in similar fields. This review aimed to ensure that the COI process and policy developed for the HITAP Foundation would align with best practices. The summary of findings was presented during the board meeting in September 2024 to facilitate a discussion on COI practices for the HITAP Foundation.

Summary of COI policies and HITAP recommendation

List	International			National					
	NICE UK	CDA Canada	PBS Australia	HSRI	THF	SCB	IHPP	HITAP (current)	HITAP (Proposed)
Conflict of Interest Policy									
1. Do they have Conflict of Interest (COI) policy for staff	✓	✓	✓	✓	✓	✓	✓	✓	✓
2. Do they have the COI policy for board members?	✓	✓ Separate form	✓	✓	✓	✓	✗	✗	✓
3. Are the COI policy publicly accessible?	✓	✓	✓	✓	✓	✓	✗	✗	✗
COI Declaration Policy									
4. Do they have the COI declaration policy and process?	✓	✓	✓	✗	✗	✓	✓	✓	✓
5. Are the COI policy and COI declaration process publicly accessible?	✓	✓	✓	✗	✗	✓	✗	✗	✓
6. Do they update the COI policy and COI declaration policy? How often?	✓ Every 3 years	✓ Every 3 years	✓ Every 3 years	✗	✗	✗	✗	✗	✓ Every 3 years
COI Process									
7. Do they have a working group for the COI policy?	✓	✗	✗	✓	✓	✓	✗	✗	✗
8. Do the members declare the COI? How often?	✓ Annual	✓ Annual	✓ Annual	✗	✗	✓ Annual	✓ At entry	✓ Annual	✓ Annual
9. Do they publish the board members' COI declaration online?	✓	✗	✗	✗	✗	✗	✗	✗	✗
Risk assessment for COI									
10. Do they have COI risk assessment policy?	✓	✗	✗	✓	✗	✓	✗	✗	✗

Remarks: Based on publicly accessible documents online