

# RICK HANSEN INSTITUTE CONFLICT OF INTEREST POLICY



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## 1. Introduction

The Rick Hansen Institute (RHI) strives to achieve the highest standards of ethical and legal conduct.

The integrity of RHI depends on ethical behaviour throughout the organization, and on fair and well-informed decision-making. The ability to make a decision is sometimes affected by other interests. Such conflicts of interest are a regular part of organizational and personal life and cannot always be easily eliminated. Managing conflicts of interest (COI) appropriately is crucial to maintaining the integrity and reputation of the persons involved and RHI itself. When a conflict of interest is ignored, improperly acted on or influenced actions or decision-making, the conduct (not the conflict) can be seen as inappropriate or even illegal (corruption).

## 2. Purpose

The purpose of this Conflict of Interest Policy is to provide guidance in identifying and managing actual, perceived and potential conflicts of interest involving RHI.

## 3. Scope

This policy applies to:

- RHI personnel and Board Directors; and
- External parties involved in RHI business activities<sup>1</sup>, including but not limited to: advisors, grant requestors and grantees.

Applicable provisions of this policy are to be addressed in contracts, agreements, terms of reference, process specific policies and procedures, grant and data applications and other relevant documents, as applicable.

## 4. Definitions and Abbreviations

*Advisors:* Individuals external to RHI who provide advice to RHI personnel and Board Directors which is intended to assist RHI in decision-making. They include but are not limited to: advisory committee members, external reviewers of funding and data applications, independent data safety monitoring board members and medical monitors.

*Board Directors:* Individuals who become Board Directors in accordance with RHI's Bylaws.

*COI Committee:* Committee that reviews and provides recommendations on conflicts of interest to the Initial COI Reviewer as required.

*COI Management Plan:* Plan that eliminates, mitigates or manages (with special safeguards or oversight) a conflict of interest.

*Conflicted Person:* A person who has a conflict of interest.

*Conflict of Interest (COI):* A conflict of interest is a situation in which a person has a personal or professional interest sufficient to appear to influence the objective exercise of his/her official RHI duties.

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<sup>1</sup> This does not preclude external parties from complying with their entity's or other applicable conflict of interest requirements.

*External Parties:* Individuals or entities external to RHI.

*Initial COI Reviewer:* The person responsible for initially reviewing an individual’s COI disclosures.

*RHI Confidential Information:* Information that is acquired solely by reason of involvement with RHI and that RHI must protect for proprietary, ethical and legal reasons. RHI confidential information includes but is not limited to personal information, personal health information and confidential business information.

*RHI Personnel:* Staff, consultants, contract employees, and volunteers of RHI.

## 5. Responsibilities

**RHI personnel, Board Directors and external parties** (further often referred to as “you”) are responsible for managing conflicts of interest in order to ensure that workplace behaviour and decision-making involving RHI are not influenced by conflicting interests.

**You** are responsible for:

- Reviewing and understanding how this policy relates to you;
- Disclosing any conflicts of interest to your Initial RHI Reviewer and those involved in the decision-making process, as applicable;
- Reviewing the interaction between your RHI duties and your other interests on a regular basis to ensure that they do not conflict;
- Respectfully identifying potential conflicts of interest of others;
- Undertaking your approved COI management plan, if applicable; and
- Making immediate disclosures when circumstances change that may lead to a conflict of interest.

**Supervisors** are responsible for:

- Providing input on conflict of interest issues involving RHI personnel under their supervision.

**Initial COI Reviewers** are responsible for:

- Requesting COI disclosures as required;
- Providing a point of contact for advice about conflicts of interest;
- Reviewing COI disclosures and determining if a conflict of interest exists, and if required, determining the related COI management plan; and
- Implementing and monitoring the application of this policy and decisions taken pursuant to it in their area of responsibility.

**COI Committees** are responsible for:

- Handling conflicts of interest of Initial COI Reviewers;
- Providing reviews and recommendations on conflicts of interest to the Initial COI Reviewer as required;
- Monitoring and ensuring compliance with this policy.

Overview of Initial COI Reviewers and COI Committees:

	<b>Initial COI Reviewer</b>	<b>COI Committee</b>
<b>Board Directors and CEO</b>	Board Chair	Full Board
<b>RHI personnel, except CEO</b>	Director, Human Resources	Persons in “RHI Terms of Reference - COI Committee below Board Level”
<b>External parties</b>	RHI Point of Contact	Persons in “RHI Terms of Reference - COI Committee below Board Level”; unless directly related to Board business: Full Board

## 6. Description

### 6.1. Policy Statement

RHI expects you to perform your RHI duties impartially, objectively and with integrity.

**Disclosure is Key.** Actual, perceived and potential conflicts of interest must be immediately and fully disclosed before a decision is made on the matter involved.

### 6.2. What is a Conflict of Interest?

A conflict of interest is a situation in which a person has a personal or professional interest *sufficient to appear to influence* the objective exercise of his/her official RHI duties.

Note in this definition the two conflicting interests that may compete:

- “A personal or professional interest”. These interests can arise in a number of ways: through a relationship (e.g., a family member or other close relationship who stands to benefit from a decision or activity), an activity (e.g., accepting a gift from a person who stands to benefit from a decision, or by performing competing work) or strong beliefs (e.g., holding strong religious or cultural beliefs on an issue RHI is considering).
- “Objective exercise of duties”. This refers to an individual’s ability to carry out her/his responsibilities in the best interest of RHI.

In the research context, a conflict of interest includes a situation where financial or other interests may compromise, or have the appearance of compromising a researcher’s professional judgment in conducting or reporting research.

A conflict of interest can be:

- Actual or real: a situation where your official RHI duties *are, or will be, influenced*.
- Perceived or apparent: a situation where your official RHI duties *appear to be influenced*.<sup>2</sup>
- Potential or foreseeable: a situation where your official RHI duties *may be influenced in the future*.<sup>3</sup>

A conflict of interest can also be positive or negative. You could be seen to favour or benefit someone, or be against them and disadvantage them.

Identifying a situation where a conflict of interest exists, appears to exist, or potentially may exist is not always easy. Individual situations can be complex. Conflicts of interest are very common; almost everyone finds him/herself in a situation of a possible conflict of interest at some time. Moreover, conflicts of interest can be created as a result of RHI duties, because the SCI community is small and interconnected. Therefore, when assessing a conflict of interest, the specific details of the situation and

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<sup>2</sup> It is important that you do not only behave ethically, but are seen to behave ethically by an impartial observer with knowledge of the relevant facts; poorly managed ‘perceived’ conflicts of interest can be just as damaging as a poorly managed ‘actual’ conflicts of interest.

<sup>3</sup> Often a potential conflict of interest can't be foreseen, and as a result, will not be covered in initial/annual COI disclosures.

the totality of the circumstances should always be considered. The following test may help to determine whether your situation is likely to interfere, or appear to interfere, with the objective judgment you must show in performing your official RHI duties:

- “Trust test”: Would other people important to RHI and the general public trust your judgment if they knew the situation you were in?

Err on the side of transparency. Present the facts to your Initial COI Reviewer. Disclosure helps to alleviate or avoid future misunderstandings.

To help you recognize conflicts of interests, please review the examples in Attachment A, and be aware of the guidelines for the use of RHI property and confidential information and acceptance of gifts and other benefits in Attachments B and C.

### **6.3. Conflict of Interest Disclosures**

When requested by your Initial COI Reviewer, you must submit a COI Disclosure Statement. This statement helps you and RHI identify circumstances that give rise to conflicts of interest.

Requests for these statements are done at a minimum:

- For RHI personnel and Board Directors: initially (i.e., upon hiring and appointment) and annually with FORM 1.
- For external reviewers of RHI funding and data applications: for each application with FORM 2.
- For RHI Committee members: initially (i.e., upon appointment) with FORM 3.
- For RHI data safety monitoring board members and medical monitors: initially (i.e., upon appointment) with FORM 4.
- For other external parties that are not mentioned above: as applicable<sup>4</sup> with FORM 5.

When you become aware of an actual, perceived or potential conflict of interest, you must immediately take steps to deal with the conflict appropriately. These steps include:

- a) Where the conflict is not of an ongoing nature, you should disclose the conflict verbally to the person leading the particular activity and all those involved in the decision-making process (if possible). Unless otherwise directed<sup>5</sup>, you should refrain from participating in any aspect of a decision-making process related to the conflict (including not voting on the issue, not speaking on the issue, avoiding influencing other people’s decision, and removing oneself from the presence of any discussion being undertaken).
  - If the disclosure is in a setting where minutes are being prepared: The disclosure and decided outcome should be recorded in the minutes. Typically, the details of the disclosure should not be recorded (to ensure the privacy of the conflicted person is not unnecessarily compromised during meeting minute disclosures).

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<sup>4</sup> Decided on a case-by-case basis with guidance from the “RHI Guidelines for Internal COI Reviewers” and/or the COI Committee.

<sup>5</sup> There will be situations where a conflict of interest is allowable after disclosure and review, for example, because of specific expertise being available from a single person or where multidisciplinary groups are asked to participate in consultations where the reason of consultation is for representatives to express the concerns of their particular stakeholder group or the affected public. In these instances, it is with the permission of the Initial Conflict of Interest Reviewer that the individual(s) shall still be asked for a review or to provide advice to RHI. Such situations will be taken into consideration in the final decision.

- If the disclosure is not a setting where minutes are being prepared:  
You should submit the disclosure and decided outcome in writing to the person leading the particular activity.
- b) Where the conflict is of an ongoing nature, arises in the context of research, or constitutes a material change in the matters disclosed in your last COI Disclosure Statement, you should also disclose the conflict to your Initial COI Reviewer and submit a revised COI Disclosure Statement.

All identified conflicts of interest must be documented.

If you identify an actual, perceived or potential conflict of interest, you are encouraged to propose a COI management plan (to eliminate or mitigate the conflict, safeguard against prejudice towards RHI decisions and activities, and provide continuing oversight, as applicable).

If you do not become aware of the conflict until after a decision has been made, you must still make the disclosure immediately.

#### **6.4. *Reviewing Conflict of Interest Disclosures***

Initial COI Reviewers will review your COI disclosures and may request missing or additional information that relates directly to and is necessary to assess and decide further actions on COI disclosures. Initial COI Reviewers may also consult, as required, with the Supervisor of the conflicted person, those leading the particular activity, and/or the COI Committee.

When evaluating any information that has been disclosed, it may be helpful to assign a conflict of interest category as follows:

- **Category A: Insignificant and Generally Permissible Activities**  
Situations where any personal or professional interest held by an individual does not indicate a significant conflict of interest and where the situation suggests no actual, perceived or potential conflict of interest. These situations may continue without a COI management plan.
- **Category B: Potential or Perceived Conflicts of Interest**  
Situations which represent a perceived or potential conflict of interest, which would be permitted to go forward after disclosure with an approved COI management plan.
- **Category C: Actual Conflicts of Interest**  
Situations which represent an actual conflict of interest, and which may be permitted to go forward after disclosure with an approved COI management plan.

#### **6.5. *Managing Conflicts of Interest***

If determined that a conflict of interest exists (i.e., for category B or C disclosures), the Initial COI Reviewer and the conflicted individual must work cooperatively on a COI management plan<sup>6</sup> to achieve a resolution of the conflict issues in the best interests of RHI. Where necessary, the COI Committee may

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<sup>6</sup> For COI management plan guidelines, see Attachment D.

be asked for advice and/or a vote on a conflict of interest and/or related COI management plan determination.

Written records must be kept by the Initial COI Reviewer as required. These may include details of the facts, who undertook the assessment and how, and what action was taken as a result.

The conflicted person and those who have a “need to know” will be informed of the decided outcome by the Initial COI Reviewer. If a COI management plan prohibits the conflicted person from carrying out a particular activity or imposes restrictions on that activity, the person must abide by that plan unless and until the decision is reconsidered and altered.

### **6.6. Reconsiderations**

Anyone may ask for reconsideration of a conflict of interest and/or related COI management plan determination to the COI Committee.

After giving reconsideration, the subsequent decision of the COI Committee regarding the conflict of interest and/or related COI management plan shall be final. The COI Committee shall notify the interested individual and those who have a “need to know” in writing of reaching its final decision.

### **6.7. Non-Compliance**

RHI expects full and immediate compliance with this policy, including COI management plans.

Anyone who has a reasonable cause to believe that someone has failed to disclose a conflict of interest or is not following an approved COI management plan, is encouraged to discuss the matter with the person in question. If that discussion does not resolve the matter or you are not confident about raising the concern directly with the person involved, you are encouraged to bring the matter to the attention of the Initial COI Reviewer. RHI will protect anyone who raises concerns related to RHI *in good faith*.

The person shall be informed of the basis for such belief and afforded an opportunity to explain the alleged non-compliance.

If, after hearing the response of the individual and further investigation as may be warranted in the circumstances, it is determined that an individual has in fact violated this policy, appropriate disciplinary and corrective action (e.g., withholding payment under a contract/agreement related to the conflict) will be taken.

### **6.8. Privacy and Record Keeping Requirements**

COI records (i.e., COI disclosures, recommendations, COI management plans and other supporting documentation) are protected in compliance with applicable law (e.g., BC's *Personal Information Protection Act*), regulatory and funder requirements.

COI disclosures will be maintained in confidence by the Initial COI Reviewers and access will be limited to persons who have a “need to know” (e.g., those responsible for review, management, administration, monitoring and auditing), and as required by law.



## 7. References

[Canada Not-for-profit Corporations Act \(S.C. 2009, c. 23\)](#)

[TCPS 2—2nd edition of Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans](#)

[BC PIPA](#)

[http://www.ccic.ca/files/en/what\\_we\\_do/ethics\\_coi\\_policy\\_long\\_e.pdf](http://www.ccic.ca/files/en/what_we_do/ethics_coi_policy_long_e.pdf)

[http://policy.nd.edu/policy\\_files/ConflictofInterestPolicy.pdf](http://policy.nd.edu/policy_files/ConflictofInterestPolicy.pdf)

<http://research.web.utah.edu/integrity/conflict/examples.html>

<http://www.oag.govt.nz/2007/conflicts-public-entities>

RHI Terms of Reference - COI Committee below Board Level, V-001

RHI Guidelines for Internal COI Reviewers, V-001 Draft

BOD-POL-006: Whistleblower Policy and Procedures, V-001

## 8. Attachments

Attachment A: Examples of Conflicts of Interest, both General & Research Specific

Attachment B: Guidelines for the Use of RHI Property and RHI Confidential Information

Attachment C: Guidelines for the Acceptance of Gifts and Other Benefits

Attachment D: COI Management Plan Guidelines

## 9. Forms

BOD-POL-005-FORM 1: Conflict of Interest Disclosure Statement for RHI Personnel and Board Directors

BOD-POL-005-FORM 2: Conflict of Interest Disclosure Statement & Confidentiality Information for External Reviewers of RHI Funding and Data Applications

BOD-POL-005-FORM 3: Conflict of Interest Disclosure Statement for RHI Committee Members

BOD-POL-005-FORM 4: Conflict of interest Disclosure Statement for RHI Independent Data and Safety Monitoring Board (DSMB) Members and Medical Monitors

BOD-POL-005-FORM 5: General RHI Conflict of interest Disclosure Statement for External Parties

## Attachment A: Examples of Conflict of Interest, both General & Research Specific

The range, complexity, and unique nature of the activities of RHI is such that it is not possible to outline all conflict of interest examples. Rather, all people involved with RHI must conduct themselves at all times with the highest ethical standards in a matter that will bear the closest scrutiny.

Typical general examples of conflicts of interest include:

- (i) Self-interested funding, contracting or hiring:** When an individual uses his/her position to influence a decision to provide funding or contracts to an organization in which he/she has an interest, or goes outside normal objective hiring processes to give a job to a friend or family member.
- (ii) Improper influence:** When an individual solicits or accepts some form of benefit in return for influencing RHI decisions or activities. For example, an employee obtains sponsorship from a travel agency for the soccer team she coaches, in return for the travel agency receiving business from RHI.
- (iii) Misuse of information or property:** When an individual uses information or property, to which others would not have access, to advance their own other interests. More info can be found in Attachment B.
- (iv) Conflict of loyalties:** When an individual's RHI duties are influenced by a relationship, some form of employment or other activity, unduly fixed views. For example, an individual serves on the boards of two SCI organizations. What happens when both boards on which the individual serves decide to approach the same individual to join the board, or when the individual hears on one Board about a grant opportunity for which the other organization could also apply?
- (v) Accepting undue benefits,** which place an individual under obligation to the donor.

Examples of non- and resolved conflicts of interest:

- Payment to a volunteer for reasonable expenses incurred by them in the performance of their duties (note however that Board Directors serve without remuneration and shall not directly or indirectly receive any profit from their position). *No conflict of interest.*
- An employee has a business or part-time job that does not compete or interfere with RHI responsibilities. *No conflict of interest.*
- An employee engages in a working lunch paid for by a supplier where the purpose of the lunch was to conduct RHI business. *No conflict of interest where such hospitality is within the bounds of propriety, a normal expression of courtesy, or within the normal standards of hospitality and as such is not likely to cast suspicion on the employee's objectivity and impartiality.*

In [research](#), typical examples of conflicts of interest include:

**(i) Financial**

This is the most obvious form of conflict of interest. If the researcher or anyone connected to him/her through their interpersonal relationships stands to gain financially in the undertaking or outcome of research, there will likely be a financial conflict of interest.

The following are examples of financial conflicts of interest:

- The researcher or someone connected to him/her through their interpersonal relationships has financial or other economic interests in the outcome of the research;
- The researcher stands to gain from the research in terms of gifts, favours or gratuities;
- The researcher will receive a bonus for positive results;
- The researcher may receive financial incentives from the Sponsor (e.g., recruitment incentives, enrolment target incentives, spin-off companies in which the researchers have stakes, or private contract research outside of the academic realm);
- If the researcher achieves significant results, there may be opportunities for participation in a conference, or other involvement with the Sponsor (e.g., consultancy).

**(ii) Direct Status/Career Benefit**

If the researcher or someone connected to him/her through their interpersonal relationships stands to gain through direct rewards in respect of his or her status (for example career status) in the undertaking or outcome of research, there will likely be a direct status benefit conflict of interest.

The following are examples of direct status conflicts of interest:

- The researcher stands to gain from the research in terms of promotions (e.g., tenure/professorship) or other special considerations;
- The researcher will be promoted or hired by the Sponsor, or be invited to participate in paid activities by the Sponsor if the research is successful.

While it is recognized that undertaking research usually will be viewed positively in terms of enhancing career advancement, the question is whether the link between career enhancement and the outcome of the research is so strong as to bring into question the objectivity of the researcher, in the research process and outcome.

**(iii) Undue Influence/Dual Roles**

This refers to situations in which the position of the researcher is such that he/she may exert an undue influence over the research, because of his/her position, or because of the vulnerability of other persons involved in the research as participants. This influence may be due to a personal or professional relationship between the affected individuals.

The following are some examples of situations in which undue influence may constitute a conflict of interest:

- The research is Investigator-initiated and thus the Investigator is also the Sponsor of the study. This is particularly notable when an Investigator-Sponsor would like to waive one or more eligibility criteria in order to enroll his/her own patient to a study;
- The researcher has a patient who may benefit from a drug being tested;
- Recognizing the particular challenges of conducting research in spinal cord injuries, if the researcher recruits participants from among his/her patients, the researcher may exert an undue influence (even subtly) on the patients' consent to participate.

**(iv) Competing Interest - Researcher**

This refers to situations in which the researcher may be influenced to draw conclusions against the interest of the Sponsor or another interested party because the researcher or someone connected to them through their interpersonal relationships has an adverse interest related to the research.

The following are some examples of a competing interest which may constitute a conflict of interest:

- The researcher is a party to a legal suit against the research company or Sponsor;
- In the instance of peer review, a lack of impartiality or bias toward an academic competitor/colleague;
- The researcher may have a financial interest in another treatment or product which is used to treat the same medical condition as the subject matter of the research.

**(v) Competing Interest - Institution**

Although economic partnerships with industry are becoming more common, there is particular risk for conflicts of interest when partnerships extend beyond an organization's corporate interests to involve institutional decision makers. Institutions and institutional decision makers are expected to fully disclose such financial interests and relationships, and researchers that are aware of such interests should also disclose them to RHI.

The following are some examples of competing interests which may constitute an institutional conflict of interest:

- The hospital and its CEO have financial interests in a medical device firm whose primary product was used at the hospital and promoted by its surgeons;
- The hospital receives substantial consulting payments from pharmaceutical companies and attracts industry funds for department career awards and other gifts.

## **Attachment B:**

### **Guidelines for the Use of RHI Property and RHI Confidential Information**

You must have authorization to:

- to use, for personal purposes, property owned by RHI; or
- to purchase RHI property unless it is through channels of disposition equally available to the public. Even then you may not purchase the property without authorization if you are involved in some aspect of the sale.

You may not take personal advantage of an opportunity available to RHI unless:

- it is clear that RHI has irrevocably decided against pursuing the opportunity; and
- the opportunity is equally available to the public.

You may not use your position with RHI to solicit people from RHI or connected with RHI for a personal business or one operated by a close friend, family member, business associate, an organization or partnership in which you hold a significant interest.

You must use RHI confidential information only for RHI business purposes.

You may not use RHI confidential information for private or personal benefit.

You must protect RHI confidential information from improper disclosure.

You must report, any incident of abuse of RHI confidential information.

You may divulge RHI confidential information if:

- you are authorized to release it; or
- it is to a person who has a lawful right to the information.

If you are in doubt about whether RHI confidential information may be released, you must request advice from your Initial COI Reviewer.

## Attachment C: Guidelines for the Acceptance of Gifts and Other Benefits

It is essential to fair business practices that all those who are associated with RHI, including RHI personnel, vendors, consultants and grantees, be treated fairly and without favouritism.

The acceptance of gifts and other benefits is permissible if:

- (a) the benefit has no more than token value (typically considered to be less than \$250),
- (b) it is the normal exchange of hospitality or a customary gesture of courtesy between persons doing business together,
- (c) the exchange is lawful and in accordance with local ethical practice and standards,
- (d) it occurs infrequently, and
- (e) the benefit is made to a person with a disability and is deemed to promote accessibility, and inclusivity.

The acceptance of gifts and other benefits is not permissible for the purpose of influencing the actions of RHI.

You may accept a gift made to you as an individual that is not based on your involvement in RHI.

There must be full and immediate disclosure to your Initial COI Reviewer in all cases where there is uncertainty about the appropriateness of gifts and other benefits. As per RHI's directions, a gift may have to be declined, returned, or offered to RHI. Key ethical principles in resolving the situation are integrity (i.e., action in line with this policy and RHI values), transparency (including honesty in discussing the issue), and respect (for the gift giver). A possible action would be to explain that policy will allow the gift to be accepted on behalf of RHI. If there is an appearance of obligation to the donor, it may be necessary to respectfully decline the gift.

## Attachment D: COI Management Plan Guidelines

In determining the management plan to deal with a conflict of interest, any relevant factors should be considered, including but not limited to:

- a) Any possible harm to RHI or RHI personnel, Board Directors, or others acting on its behalf, if the conflict is allowed;
- b) Any possible harm to the interest of the SCI community, RHI partners or the public, if the conflict is allowed;
- c) Whether reasonable alternative arrangements are possible which do not create a conflict of interest or whether conditions may be imposed that would eliminate the conflict of interest;
- d) The consequences to RHI, its reputation and future activities if the conflict of interest is or is not allowed;
- e) The research and other interests of RHI;
- f) The degree to which the conflict, where arising in the context of research, might compromise the researcher's professional judgment in conduction or reporting research; and
- g) The rights and interests of the conflicted person.

A typical management plan for an actual conflict of interest involves refraining from participating in a decision-making process related to the conflict (including not voting on the issue, not speaking on the issue, avoiding influencing other people's decision, and removing oneself from the presence of any discussion being undertaken). Taking one of those steps will usually be enough to adequately manage a conflict of interest.

For a perceived conflict of interest, some form of clarification to avoid misunderstanding is all that is needed (rather than action to mitigate a conflict of interest).

There is a broad range of options for a COI management plan. The options include but are not limited to:

- taking no action;
- enquiring as to whether all affected parties will consent to the conflicted person's involvement;
- imposing additional oversight or review over the conflicted person;
- withdrawing from discussing or voting on a particular item of business at a meeting;
- exclusion from a committee or working group dealing with the issue;
- re-assigning certain tasks or duties to another person;
- agreement or direction not to do something;
- withholding certain confidential information, or placing restrictions on access to information;
- transferring the conflicted person (temporarily or permanently) to another position or project;
- relinquishing the private interest; or
- resignation or dismissal from one or other position or entity.