

ACAM Conflict of Interest Policy

**POLICY NUMBER/
REFERENCE:** 9-250723

POLICY TITLE: ACAM Conflict of Interest Policy

POLICY STATEMENT:

ACAM CPD Home membership is available to non-exempt medical practitioners in Australia at www.acam.org.au. It is not limited to members and fellows of ACAM but is open to those whose academic and clinical practice are aligned with the Australasian College of Aesthetic Medicine.

Objective

To ensure the integrity of ACAM decision making processed and to advise our stakeholders of the measures we to ensure ethical decision making ensures.

DEFINITIONS:

Background

Managing conflicts of interest demonstrates ACAM's commitment to good governance, ethical conduct with uncompromised decision making.

Purpose

This policy outlines how ACAM CPD Home prevents, identifies and manages any actual, potential, or perceived conflicts of interest within its decision makers. This policy aims to ensure that any decision making on behalf of ACAM is made solely in ACAM's interests, and is not, or perceived to be, undermined or influenced by any other allegiances or interests (direct or indirect) of the decision makers individually or collectively.

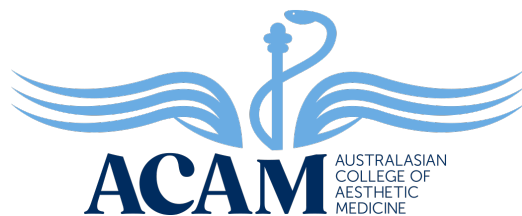
This includes decisions in relation to the listing of learning content and the compliance of subscribers with their ACAM CPD Program requirements and the Medical Board of Australia registration standard.

This policy supports ACAM CPD Home to manage risk and safeguard ACAM's reputation and the trust placed in it by subscribers, external course merchants, any accrediting or regulatory bodies and the general community. The policy also supports ACAM's CPD Home's compliance with its legislative and statutory obligations and good governance requirements and standards.

Scope

With regard to decisions made for or on behalf of ACAM CPD Home, this policy applies to:

- members of the ACAM Board and any of its committees;



- the ACAM Association Manager
- members of the ACAM CPD advisory committee;
- members of any other committee (i.e. membership, education), working or advisory group, or sub-group formed under the auspices of the above; and
- any employees, contractors, or volunteers involved in making decisions on the behalf of or in relation to the operations of ACAM CPD Home.

PROCEDURES:

It is the policy of ACAM CPD Home, as well as the responsibility of the ACAM college board and committees that the ethical, legal, financial, education and training, or other conflicts of interest be avoided. And that any such conflicts (if and when they do arise) do not conflict with the obligations of ACAM CPD Home decision makers to ACAM CPD Home and its stakeholders (for example course merchants and education providers).

- It is appreciated that conflicts of interest are common; they do not present a problem if they are openly and effectively managed.
- If a real, apparent or perceived conflict of interest is identified, ACAM will record the conflict into a Register of Interests held by either ACAM CPD Home or one of its decision-making entities, whichever is most appropriate for the circumstances.
- The Register of Interests will be maintained by the Chair of a decision-making entity, or their delegate.
- The register will record the nature of the conflict of interest.
- The Register of Interests will be included in the meeting papers of any decision-making entities.
- Where a decision maker becomes aware of a yet undeclared real, apparent or perceived conflict of interest they are requested to disclose it the Chair of the decision-making entity on which they are a member or, if applicable, in the event of employee, to their immediate supervisor.

Roles and Responsibilities

ACAM CPD Home will manage conflicts of interest by requiring decision makers covered under the scope of this policy to:

- Disclose to the decision-making entity of which they are a member, or, if for example they are a ACAM CPD Home any personal or business interests that may give rise to actual or perceived conflicts of interest and ensure they are managed appropriately;
- Avoid conflicts of interest where possible;
- Ensure any individual or personal or financial interests, including those of any associated person, do not conflict with their ability to perform official duties in an impartial manner.
- The Chair of a ACAM CPD Home decision making entity, or their delegate are obligated at each meeting:
- To provide a list of declared conflicts of interest of and to the members of that decision making entity;



- To request any further declarations of interest be made that may, or be seen to, impact the impartiality of a decision maker;
- To direct the meeting to consider what action, if any, is required to manage a conflict of interest; and
- To note any conflict of interest to the register of interests.

Confidentiality of Disclosures

- All individuals carrying out ACAM's CPD Home business are required to preserve the principles of confidentiality.
- Information contained in a declaration of interest, papers and minutes of any ACAM CPD Home decision making entity or any other resource material from ACAM CPD Home is provided and received in confidence and is only to be used for ACAM CPD Home business.
- Information obtained on this basis by individuals carrying out ACAM CPD Home business must not be used to gain advantage for either themselves, a third party, or to cause detriment to ACAM CPD Home or its parent entity or for any other purpose.
- ACAM CPD Home business should not be discussed by any individual involved in ACAM's CPD business with any external party at any stage, unless specifically authorised to do so in the following circumstances:
 - Requests to disclose relevant information made by a Commonwealth authority or a State or Territory authority, for the purpose of assisting the authority in the performance of its functions or duties;
 - Requests to disclose relevant information made by regulatory and/or legislative authorities; or
 - Requests to disclose relevant information regarding any legal proceedings of any nature and to any third parties connected with those proceedings.
- All declarations of interest and information obtained while carrying out ACAM CPD Home business will be treated as confidential in perpetuity.

Gifts and hospitality

- Gifts or hospitality made available to any individual covered under the scope of this policy, and pursuant to the ACAM Code of Conduct, which may reasonably be considered as connected to their position as an ACAM decision maker (including potential future decision maker) and could be seen to compromise their impartiality and must not be accepted or solicited.
- Any such gift or hospitality must promptly be declared via the Gift Declaration Form.
- Gifts or hospitality must not be accepted from any person engaged or who proposes to engage in a CPD Home tender.

Action

Where there are real, apparent or potential conflicts of interest for a member or members of ACAM's decision-making entity (e.g. a Board or Committee member) in general or regarding a specific matter, the entity (excluding members with a conflict) will note the conflict and consider whether the conflict is one which:



- Needs to be avoided or simply documented;
- Will realistically impair the disclosing person's capacity to impartially participate in decision-making;
- Is likely to create an appearance of improper conduct that might impair confidence in, or the reputation of ACAM's CPD Home or its parent entity;
- Should preclude the individual from participating in any voting;
- Should preclude the individual from participating in the discussion; and
- Should preclude the individual from being present during either, or both, the discussion and vote; or
- Any other decision makers covered under the Scope of this policy, their immediate supervisor will determine if they can exercise their decision-making duties impartially or if the decision should be delegated to an alternate decision maker.

Compliance (when applicable)

Where there is reason to believe that an individual subject to this policy has failed to comply with it, ACAM CPD Home will investigate the circumstances and take what action, if any, is required pursuant to this policy.

If it is found that this individual has indeed failed to disclose a conflict of interest, ACAM CPD Home decision making body may take action against them:

- This may include terminating their position on a decision-making entity; or
- or disciplinary action pursuant to the ACAM's Conditions of Employment, committee and board responsibilities.

If a person suspects that a decision maker has failed to disclose a conflict of interest, they must:

- Present the information concerning the case of a member of the decision-making entity notify the Chair; or
- Present the information concerning the case of any other decision makers covered under the scope of this policy notify ACAM board member and association management.

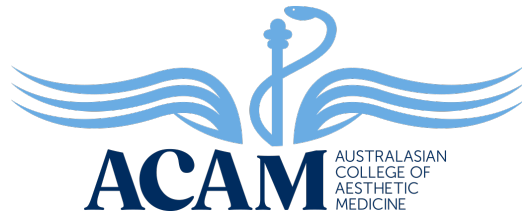
AMENDMENTS/REVIEW:

'Review or Amended by the Management Committee (23 July 2023)'

'Endorsed by Management Committee (31 July 2023)'

RELATED DOCUMENTS

1. The Australian Medical Council (AMC) Criteria for accreditation of CPD homes
2. ACAM Code of Conduct
3. Glossary of Terminology



REFERENCES:

Corporations Act 2001

File: ACAM Policy and Procedural Manual/Policy Manual Complete/Updated Policies/ACAM Conflict of Interest Policy 9-250723

Telephone: 02 9167 9398

Email: secretary@acam.org.au

Website: <https://www.acam.org.au>

Address: Australia Square Level 33, 246 George Street, Sydney NSW 2001