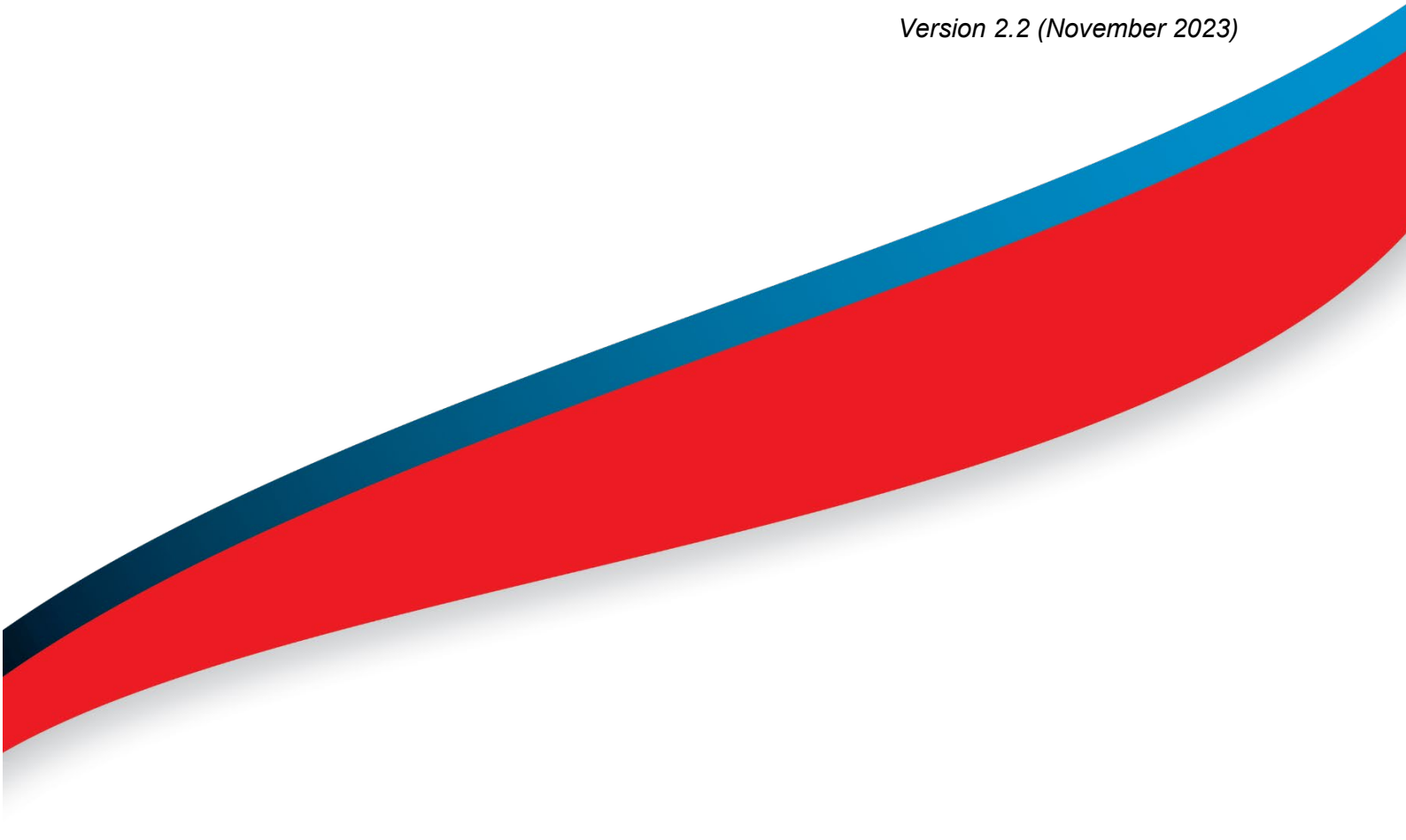




**SOUTH AUSTRALIAN  
MEDICAL EDUCATION & TRAINING  
HEALTH ADVISORY COUNCIL**

# **ACCREDITATION CONFLICT OF INTEREST POLICY AND PROCEDURE**

*Version 2.2 (November 2023)*



## Policy Statement

The South Australian Medical Education and Training (SA MET) Health Advisory Council (the Advisory Council) is committed to having accreditation processes that are transparent, impartial and without undue influence or interference from any person or organisation, including government, health facility or professional association.

This policy outlines a governance framework for identifying, managing and recording conflicts of interest that will arise from time to time in the SA MET Unit, accreditation survey teams, the Advisory Council and the Accreditation Committee (the Accreditation Committee).

For the purpose of this policy a conflict of interest is a set of circumstances that create a risk of professional judgement or actions being unduly influenced by personal interest. An actual or perceived conflict of interest may have an impact on independent decision-making, the nature of discussions or the willingness of others to raise and discuss issues.

## Scope

This policy applies to all SA MET Unit staff, members of accreditation survey teams, members of the Advisory Council and the Accreditation Committee who are involved in any aspect of the accreditation decision-making process including, but not limited to, the following activities:

- > Review of health service or Local Health Network (LHN) accreditation submissions and evidence addressing compliance
- > Supporting and advising facilities in accreditation preparation
- > Analysis of accreditation evaluation data
- > Supporting and advising accreditation teams at visits and in report development
- > Review of accreditation reports
- > Participating in discussions, recommendations and decision-making on accreditation matters
- > Formulation of accreditation provisos and commendations
- > Monitoring progress on accreditation provisos

## Compliance

The Australian Medical Council's Domains and procedures for assessing and accrediting prevocational (PGY1 and PGY2) training accreditation authorities details the domains that prevocational training accreditation authorities must demonstrate to ensure compliance.

Conflict of interest processes are addressed in both Domain 2 and Domain 4, and relates to both broader organisational structures, accreditation structures and appropriate processes implemented to manage risks.

- > Domain 2.2: The prevocational training accreditation authority's governing body has developed and follows clear procedures for identifying and managing conflicts of interest.
- > Domain 4.3: The prevocational training accreditation authority has developed and follows procedures for identifying, managing and recording conflicts of interest in the accreditation work of survey teams and working committees.

The Advisory Council is required to provide evidence to the AMC that demonstrates clear independent accreditation decision-making, free from undue influence.

## Context

The accreditation process draws people of broad experience to participate on accreditation survey teams or have membership on the Advisory Council or Accreditation Committees. These roles have the potential to conflict with employment or personal interests which could lead to an actual or perceived bias in accreditation discussion and decisions.

Examples of a perceived or actual conflict of interest within an accreditation site visit discussion include where an SA MET Unit staff member, accreditation visit team member, Advisory Council member or Accreditation Committee member:

- > is currently employed at a facility or LHN being discussed.
- > has professional or financial involvement in the facility or LHN being discussed.
- > has a current application for employment at the facility or LHN being discussed.
- > has a significant relationship with a person, for example a spouse, either directly involved in the medical education of Trainee Medical Officers (TMOs), or an interest in an accreditation decision, for example a Director of Clinical Training (DCT), Medical Education Officer (MEO) or Executive Director of Medical Services (EDMS) at the facility being discussed.
- > has professional, personal, or financial interest which may conflict, or be perceived to conflict, with the accreditation function.

## Principles

The following principles govern the SA MET Unit's management of conflict of interest:

- > Transparency and accountability
- > Fairness and integrity
- > Independent and unbiased decision-making
- > A high standard of ethics

## Responsibilities

Responsibility for the management of the Conflict of Interest Policy and Procedures rests with the Advisory Council supported by the Accreditation Committee and the SA MET Unit.

### **SA MET Unit will:**

- > Identify where a conflict of interest could exist.
- > Notify the Presiding Chair of the Advisory Council and Chair of the Accreditation Committee where there is a concern that a conflict of interest exists.
- > Restrict access to accreditation and monitoring reports where a conflict of interest exists, for Advisory Council and Accreditation Committee members.
- > Maintain a register for all identified conflict of interest for the Advisory Council, Accreditation Committee and accreditation team members that is updated annually.

### **Advisory Council and Accreditation Committee members will:**

- > Disclose any actual or perceived conflict of interest with agenda items at the beginning of meetings or during the meeting should a conflict of interest become evident.
- > Include declaration of conflict of interest as a standing agenda item.
- > Ensure conflicts of interest are identified in the minutes and that a member with a conflict of interest does not participate in or remain present during the discussions on the matters in which they have an actual or perceived conflict of interest.

**Accreditation Visit team members will:**

- > Notify the SA MET Unit if members believe their role on an accreditation visit could be seen as an actual or potential conflict of interest.

**LHN undergoing accreditation will:**

- > Notify the SA MET Unit in writing if they are aware of any conflicts of interest that could impact or influence the outcome of an accreditation visit.

**Procedures for Managing Conflict of Interest**

To ensure there is confidence in the accreditation processes the following steps will apply to manage conflict of interest.

1. All Advisory Council, Accreditation Committee and accreditation surveyors will complete a Confidentiality and Conflict of Interest declaration that will be updated annually.
2. LHNs will be notified of the membership of accreditation surveyor team at least two months prior to a visit and will be required to respond in writing to confirm that a conflict of interest either does or does not exist.
3. Any informal notification, which includes 'off the record' information, of a perceived or actual conflict of interest of an accreditation team member or SA MET Unit staff member must be recorded and investigated.
4. The response to any informal or 'off the record' notification, which will include informing the team member or SA MET Unit staff member, must also be recorded and notified to the facility concerned.
5. If a conflict of interest emerges during an accreditation visit the nature of the conflict is to be recorded and the team leader is to advise the SA MET Unit. Depending on the nature of the conflict the team member may be asked to abstain from participating further in the visit and not contribute to the accreditation recommendation, at the team leader's discretion.
6. If a conflict of interest emerges during discussion of an accreditation matter at an Accreditation Committee meeting the nature of the conflict is to be minuted and the member is not to participate in or remain present during the discussions in which they have an actual or perceived conflict of interest.
7. Members of the Advisory Council and Accreditation Committee who have registered a conflict of interest will not receive accreditation or monitoring reports related the identified conflict. They will not be involved in the discussion or the accreditation status decision-making process in relation to that item.
8. If a conflict of interest emerges during discussion of an accreditation matter at an Advisory Council meeting the nature of the conflict is to be minuted and it will be at the Presiding Members discretion whether the member remains in the room or is asked to remove themselves. The action taken in the meeting in response to the identified conflict is to be minuted.

**Monitoring**

The SA MET Unit review this document in November 2027.

## Definitions

**Actual bias or conflict of interest** – an actual conflict of interest exists where a person’s current employment or financial interests, or personal relationships could compromise their impartiality in contributing to accreditation decisions or having membership of an accreditation team.

**Perceived bias or Conflict of Interest** – a perceived conflict of interest exists if it can be perceived by others that a conflict of interest could exist that may affect the person’s capacity to be seen as being independent.

**Potential conflict of interest** – a conflict may arise if a particular set of circumstances should occur.

## Relevant Legislation

- > Public Sector (*Honesty and Accountability*) Act 1995
- > Public Sector Act 2009
- > Health Care Act 2008
- > Australian Medical Council’s Quality assurance – AMC domains and procedures for assessing and accrediting prevocational (PGY1 and PGY2) training accreditation authorities.

## Relevant SA MET Policies and Guidelines

- > Accreditation Policy and Procedure
- > Accreditation Surveyor Guideline

## Other relevant documentation

- > Code of Ethics for the South Australian Public Sector
- > Government of South Australia’s Honesty and accountability of members of government boards

## Document history

Date effective	Author/Editor	Approved by	Version	Change Reference
March 2014	Project Officer, Accreditation	SAMET Health Advisory Council	0.7	Original document
February 2015	Project Officer, Accreditation	Senior Project Officer, Accreditation	1.0	Updated to align with new standards and processes
December 2018	Project Officer, Education & Accreditation	Manager – Education & Accreditation	v2.0	Change of Conflict consideration at Accreditation Committee meetings
August 2021	Manager – Education & Accreditation	Manager – Education & Accreditation	v2.1	Reviewed. Minor changes.
22 November 2023	SA MET Accreditation Committee	SA MET Health Advisory Council	v2.2	Amended to align with AMC National Framework.

# Confidentiality Agreement and Conflict of Interest Declaration



I, ..... give this agreement to the South Australian Medical Education and Training (SA MET) Health Advisory Council (the Advisory Council).

I acknowledge that all information to which I gain access as a result of my work as an accreditation surveyor for the Advisory Council and/or as a member of the Advisory Council Accreditation Committee, including information provided by the health service, documents relating to accreditation visits and any report I author or co-author in this capacity is confidential and will be used for the sole purpose of fulfilling my role as an accreditation team member and/or member of the Advisory Council Accreditation Committee.

I acknowledge that any perceived or actual bias or conflict of interest I may have between my membership of the Accreditation Committee or an accreditation team and my professional or personal interests must be fully disclosed in this form in accordance with the SA MET Unit Accreditation Conflict of Interest Policy. I acknowledge and agree to comply with any approach for removing or managing a perceived or actual conflict of interest.

**The terms of the agreement are:**

1. I will not disclose, either directly or indirectly, the contents of any accreditation team reports, associated material or data without prior written authorisation from the Advisory Council Accreditation Committee Chair.
2. I will take all reasonable steps to ensure that any person, other than those persons permitted by the SA MET Unit, does not have an opportunity to inspect or otherwise have access to confidential accreditation information.
3. I have read and understood the SA MET Unit’s Accreditation Conflict of Interest Policy and have made a full and frank disclosure of bias or interests that may put me in a conflict of interest situation.
4. I will take all reasonable steps to notify the SA MET Unit of any bias or conflict that arises through professional, financial or personal interests in the future.

I have professional, personal or financial interests which may conflict, or be perceived to conflict with the SA MET Unit’s accreditation function as outlined below:

Nature of the interest (professional, employment, personal, financial, other)	Name facility, private practice, or LHN
Currently employed at	
Consults at	
Has a significant personal relationship with a person at	
Has a financial interest in	