

OSLER CPD: CONFLICT OF INTEREST POLICY

Introduction

This policy is to help Osler effectively identify, disclose, and manage any actual or potential conflicts of interest to protect the integrity of the organisation and its subscribers. Osler acknowledges that conflict of interest should be identified early, and avoided where possible, but will act openly and transparently if a conflict is identified. Osler staff are required to identify and/or avoid any conflict in relation to the ethical, legal and financial interests of the business that may cause detriment to its subscribers.

Scope

This policy applies to all Staff, Advisory Group Members, Board Members, and Volunteers who are involved with the Osler CPD Program.

Definition

A conflict of interest occurs when a person's personal interests conflict with their responsibility to act in the best interests of the CPD program or an agreement hinders the ability of an Osler representative to act in the best interests of the CPD program for the benefit of the subscribers.

Examples could include:

- Self-benefit or promotion
- Financial
- Having a similar functional responsibility in an organisation that financially or administratively supports Osler CPD home e.g. Board position at the Australian Medical Council
- Conflicting relationships
- Intellectual Property
- Gifts

Procedure

Disclosure: Staff, Board Members, Advisory Group Members, and Volunteers have a responsibility to disclose any known or potential conflicts to their manager or directly to the CEO. Disclosures must be made as soon as the conflict or potential conflict is recognised. If a known conflict is not disclosed, this may result in disciplinary action or removal from a group.

Below outlines the reporting lines.

Conflicted Person	Reports To
CEO	Board of Directors
Chief Medical Officer	CEO
Chief Information Officer	CEO
CPD Home Manager	CEO or Chief Medical Officer
CPD Advisory Group Member	Chief Medical Officer (Chair)
CPD Admin Support Staff	CPD Home Manager
CPD Technical Support	Chief Information Officer

Review: Once a disclosure has been made, relevant senior staff at the organisation will review the conflict and determine the relevance.

An outcome of the determination of the conflict will be made by applying the following rules to the review when conflict is identified:

- Could involvement in this matter cast doubt on the integrity of Osler CPD Home to function for all subscribers equally
- If another CPD Home was doing this, would we suspect it to be a conflict of interest
- What assessment would an independent person make of the circumstances of the conflict of interest, either perceived or real
- If Osler did participate in the activity and it was made aware to the Australian Medical Council or to AHPRA, how would they perceive the activity
- Is the matter one of public interest whereby the public would perceive it as a conflict

Action: If a conflict of interest is determined to be relevant, the decision on what action to take will consider:

- The nature of the conflicting interest and whether the conflict needs to be avoided or simply documented
- The likelihood of the interests actually coming into conflict and alternate options to avoid the conflict
- The decisions or actions which the person agrees to avoid or not take part in

Once a plan is devised it will be noted in the minutes of the next meeting: The CPD Advisory Group Meeting, Osler CPD Home Meeting and Osler Board Meeting, and added to a register of disclosed interest in the agenda.

This ensures that any determination becomes available information for the continued operation of the business for regular review on an as-needs basis.

External Influences

Where external influences (such as partnerships with advertisers) create a conflict of interest as it relates to the design and execution of Osler's CPD Home program, these conflicts will be publicly declared.

Revision History

Version	Date	Description/Comments
1.0	November 2023	New Document
1.1	May 2025	Updates include further definition of and examples of conflict and how disclosed conflict will be managed.
1.2	September 2025	Further clarity on reporting lines and the addition of what will be considered for action.