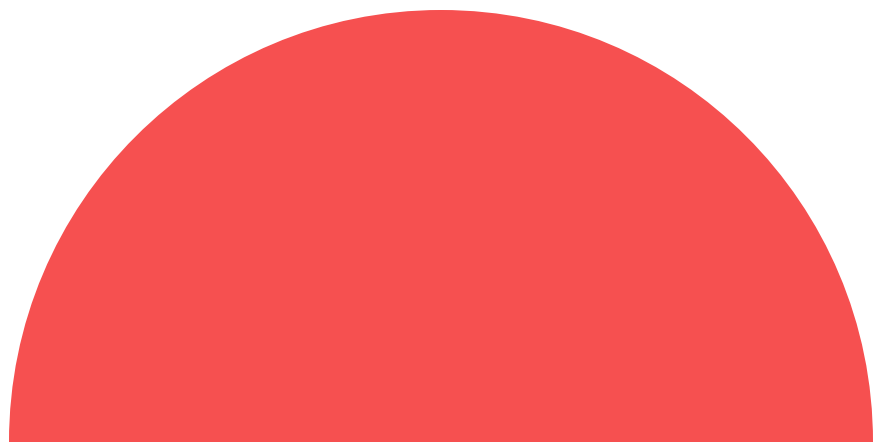


PATH's Guiding Principles for Managing Conflict of Interest



PATH creates sustainable, culturally relevant solutions that enable communities worldwide to break longstanding cycles of poor health. Our mission is to improve the health of people around the world by advancing technologies, strengthening systems, and encouraging healthy behaviors.

We are strong advocates of our ideas and programs, and on occasion some level of bias is inherent in our work. In some cases, these biases, or the perception of these biases, may actually impede our goal of achieving maximum public health impact. Thus, understanding and managing our biases, and in some cases, possible conflicts of interest, are important and ongoing responsibilities for PATH.

These concerns are increasingly apparent. In recent years:

- The external environment has changed. On local, national, and international levels, awareness and sensitivity regarding bias and conflict of interest are increasing across a range of activity areas – from research involving human subjects, to technology development collaborations with private companies.
- PATH's organizational growth and increased visibility have brought us to an active role in the highest levels of international policy and procurement.
- Technologies that PATH developed or helped advance have been adopted globally or are being considered for global adoption.

Purpose

The purpose of these principals is to articulate PATH's organizational values and approaches for managing actual and perceived conflicts of interest. These principles address our values, our responsibilities, and our actions.

Definitions

Bias

Bias is a preference or inclination, especially one that may inhibit impartial judgement. In many cases, we have bias toward a certain technology or strategy because we believe it is the best way to improve public health. However, when a bias favors individual or institutional private interests, a conflict of interest may emerge.

Conflict of interest

Conflict of interest is the conflict between the private interests and official responsibilities of an *individual* or an *institution* in a position of trust, which may compromise impartiality or integrity or lead to unfair competitive advantage.

Actual vs. perceived conflict of interest

Conflict of interest may be *actual* or *perceived*. Perceived conflict of interest often results from partial information. But conflict of interest, whether actual or perceived, reflects negatively on PATH.

Individual conflict of interest vs. institutional conflict of interest

Individual conflict of interest exists when the private interest of a staff member may conflict with his/her official responsibilities. Institutional conflict of interest exists when the private interest of an organization may conflict with the official duties or position of that organization.

Direct and predictable effect

A particular matter will have a *direct effect* on a private interest if there is a close causal link between any decision or action to be taken in the matter and any expected effect on private interest. A particular matter will have a *predictable effect* if there is a real, as opposed to speculative, possibility that the matter will affect the private interest. If a direct and predictable effect is present, conflict of interest likely exists.

Guiding Principles for Managing Conflict of Interest

Our Values

Disclosure

We strive for proactive disclosure of our interests when in public fora. We also acknowledge that disclosure may not always be sufficient and that we may need to remove ourselves from these fora in some instances.

Transparency

We strive for maximum transparency in the structure of business arrangements related to our product and program activities.

Respect

We respect informed decisions made by others with regard to our participation in activities where we may have private interests.

Support

We respect and support individual staff actions taken to remove themselves from situations of conflict of interest.

Options

We maintain a full range of options in structuring business arrangements in order to achieve maximum public health impact.

Our Responsibilities

Acknowledgement

We accept that on occasion some level of bias is inherent in our work at PATH, and that in some cases this may lead to conflict of interest – whether actual or perceived, individual or institutional.

Accountability: individual conflict of interest

Individual staff members are responsible for understanding and managing individual conflict of interest issues.

Accountability: institutional conflict of interest

PATH has an additional responsibility to articulate its core values and educate staff in management of institutional conflict of interest issues.

Our Actions

Training

We educate staff so they can effectively understand and manage individual and institutional conflict of interest issues in ways that support our values.

External monitoring

We monitor our business arrangements for changes in institutional conflict of interest concerns and, if necessary, restructure them.

Internal monitoring

We monitor and update, as appropriate, our own policies and procedures regarding both individual and institutional conflict of interest.