



IIOP

INSTITIÚID CÓGAISÍOCHTA NA hÉIREANN
IRISH INSTITUTE OF PHARMACY

Practice Review: Conflict of Interest Policy

Title:	Practice Review: Conflict of Interest Policy	
Version:	4.8	
Effective Date:	01/08/2022	
Review Date:	01/08/2023	
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Policy Summary

Practice Review is designed to be a robust and fair process. Every effort has been made to ensure that this is the case. The IOP recognises that under certain circumstances, potential conflicts of interest may arise during the course of Practice Review. The IOP is committed to aiming to ensure that conflicts of interest do not affect the outcome of Practice Review.

Practice Review is a peer-led process operating with extensive input from the profession. During the SPI component of Practice Review, a Practice Reviewer uses a standardised checklist to evaluate the interaction. The checklist consists of a list of objective and observable actions which reflect the skills and competencies relevant to that interaction. When the Practice Reviewer observes the pharmacist demonstrating these actions, they mark the checklist accordingly.

As Practice Reviewers are peer pharmacists there is a chance that participants may know one or more of the Practice Reviewers at a Practice Review event. Although Practice Reviewers must complete Conflict of Interest declarations for each of the participants undertaking a defined Practice Review it is only in certain circumstances, as described in this policy, that provisions for an alternative Practice Reviewer will be made. With pharmacy being a relatively small profession and considering the logistical practicalities of an event such as Practice Review it is not possible to ensure that all Practice Reviewers are separated from all participants they may know in some capacity. Nonetheless, participants can have confidence in the integrity of Practice Review as it is underpinned by robust quality assurance processes. Practice Reviewers have undergone training to ensure they will be fair and objective in their role, and there are systems in place to ensure objectivity is preserved at all parts of the process.

Scope

This policy outlines the principles and procedures for managing potential conflicts of interest within the Practice Review process.

Purpose

Practice Reviewers must review, and be seen to review, the pharmacist and their performance during Standardised Pharmacy Interactions (SPIs) without prejudice or conflict.

It is the responsibility of Practice Reviewers to declare a potential conflict of interest, as defined in this policy, in advance of reviewing pharmacists undertaking Practice Review.

Definitions

A conflict of interest may generally be defined as a conflict between the responsibilities of the Practice Reviewer and any other interests the particular individual may have and as such could compromise or appear to compromise their decisions.

If a reasonable person, not involved in the Practice Review process, would consider that the presence of a particular Practice Reviewer could cause concern with regard to bias - either to the pharmacist's advantage or disadvantage - this may be deemed a conflict of interest.

Examples of Conflicts of Interest

It is not possible to provide a definitive list of examples of conflicts of interest; however the following are examples of situations that could lead to actual or perceived conflicts of interest:

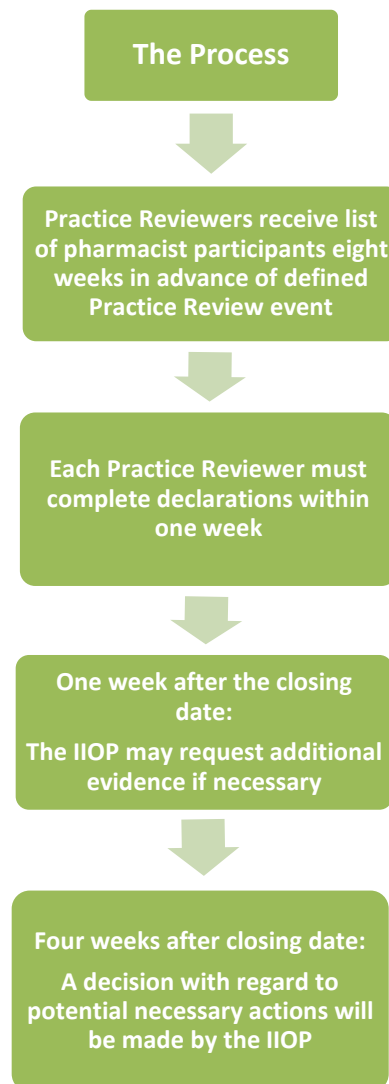
- The pharmacist is an immediate family member (*defined as your spouse, child, sibling, parent, stepchild, stepparent, as well as mother-, father-, son-, daughter-, brother, or sister-in-law*)
- The Practice Reviewer is an employer or manager of the pharmacist. *Note: when deciding what is defined as a “manager”, factors such as the hierarchy in the business/organisation will be taken into account.*
- Practice Reviewers who have been involved in Fitness to Practice proceedings relating to a participant pharmacist or vice versa

The Process

The process for managing potential conflicts of interest is as follows:

- a) Practice Reviewers will be provided with a list of pharmacists participating in the Practice Review, eight weeks in advance of the defined Practice Review event;
- b) Practice Reviewers must complete conflict of interest declarations for all participants. Conflict of interest declarations must be completed and returned within one week*.
- c) The conflict of interest declarations will be reviewed by the IIOB;
- d) The IIOB may request evidence to support the information declared, if deemed necessary;
- e) The IIOB will decide if any action is required to mitigate any identified conflicts.

**Declarations provided to the IIOB after the conflict of interest process has “closed” – for example if a potential conflict of interest is discovered at a later date – may also be reviewed by the IIOB and acted upon if considered necessary and feasible*



Action

The IOP will act appropriately to avoid or mitigate actual conflicts. In many cases, the disclosure of a potential conflict in itself will be sufficient.

Dependent on the nature of an identified conflict, one of the following actions may apply:

- The IOP will document an official note of the declared conflict of interest. The robust assessment process of Practice Review will identify any potential anomalies in Practice Review outcomes. These may be cross-referenced against noted conflicts of interest. This will be referred to the Review Board for consideration if necessary.
- The IOP may make provisions for an alternative Practice Reviewer for review of a particular pharmacist.

For each Practice Review event a record of declared conflicts of interest, and any required actions, will be maintained.