

**Guidelines on the Management of Relationships with  
Organizations with Vested Interests**

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**1. Introduction**

ICARA represents national and international ATOD (Alcohol, tobacco and other drug) research associations and recognizes their diversity in purpose and function. Furthermore, such associations operate in very different financial contexts, with a few having steady sources of income from membership fees, conferences or journals, and others relying on government support or voluntary donations. Many will also be supported by sponsorship or funding from private organizations for conferences or other activities.

Funding organizations, especially private enterprises, can have goals that conflict with the aims or purpose of the society as they exist primarily for profit, not public good. Problems might therefore arise when sponsorship is provided by such organizations with vested interests. A vested interest can be defined as “a strong reason for supporting a particular action which will give a personal or financial advantage”. In the context of ATOD research, vested interests can be individuals or organizations interested in promoting a specific view on or opinion about research or public health issues in the ATOD field, for financial or other reasons. Sponsorship also serves the purpose of enhancing the sponsor’s reputation and potential influence in ATOD policy or politics.

These guidelines result from the documentation of the growing involvement of private enterprises, including the corporate alcohol industry, in ATOD research<sup>1</sup>. It reflects the increasing concern about the involvement of such industries in activities that impinge upon the public health and social welfare missions of individual research scientists and, more broadly, of the mandate of research societies, associations and organizations.

Traditional boundaries between scientists and for-profit industries have been diminishing in many countries as part of a general trend to make science more relevant to business applications and for nonprofit organizations to attract new sources of revenue<sup>2</sup>. This policy seeks to provide guidelines for research societies and for their academic and administrative staff with regard to engagement with industry organizations, as well as relationships with other funders.

The guidelines provided here do not seek to instruct ICARA members on what funding sources are appropriate for member organizations. If the profits of the sponsoring organization rely on the production or sale of addictive or potentially harmful commodities, ICARA urges members to exercise caution, and to make decisions based on careful consideration of potential risks and benefits both to the member organization and to the public good.

**2. Organizations with vested interests**

Several groups of organizations have vested interests in the ATOD field and the risks and benefits of interaction with and accepting support or sponsorship from each of these organizations will vary (see Table 1). Financial conflicts of interest (whether direct or indirect) are generally considered to carry the highest risk, but other interests may become equally important if in conflict with the goals of an ATOD research association.

**Table 1: Organization Types & Potential Vested Interests (not an exhaustive list)**

For profit:	Not for profit:
<ol style="list-style-type: none"> <li>1. Businesses involved in the production of ATOD products for (non-medical) use: alcohol beverage producers; tobacco product manufacturers, marijuana product manufacturers. These business generally have a vested interest in selling more of their products and avoiding policy measures which might reduce or restrict sales. (high)</li> <li>2. Businesses involved in the distribution or retail of ATOD products: supermarkets, wholesalers; shops; public houses, bars, hotels, restaurants, casinos, betting shops etc. These business generally have a vested interest in selling more ATOD products from their premises (or type of premises) and avoiding policy measures that might reduce or restrict such sales. (high)</li> <li>3. Businesses involved in the production or sale of treatments or remedies for problems caused by ATOD use e.g. pharmaceutical companies; treatment providers etc. and which have a vested interest in promoting such treatments. (medium)</li> <li>4. Businesses involved in supporting the academic or research community e.g. publishers, research software or equipment providers etc. (lower)</li> </ol>	<ol style="list-style-type: none"> <li>5. Social aspects or public relations organizations linked to or funded by the above businesses, but which may have publicly stated goals that differ from those of the business. It may be hard to determine whether these organizations are funded by the industry or not, and they may be constituted as charities (risk same as funding source)</li> <li>6. Social enterprises, charities, NGOs or professional organizations which may or may not be linked to private industry funding, but which serve a specific function (e.g. providing in-patient treatment) and may have a vested interest in policy attention or funding being paid to a particular aspect of ATOD problems or treatment (e.g. advocating for in-patient treatment) to ensure their own viability. (medium)</li> <li>7. Public or semi-public organizations involved in the production or sale of ATOD products e.g. state monopolies for the sale of alcohol, tobacco or state-owned gambling organizations. Depending on their remit and regulatory regime, they may have vested interests in selling more or fewer products (variable, dependent on regulatory regime).</li> <li>8. Private individuals with personal or political motives for sponsorship.(medium)</li> <li>9. Public funders such as Government ministries, public health organizations or municipal authorities which usually have no direct economic interests but which may have specific political or professional interests (lower).</li> </ol>

Given the goals of ATOD industries is to maximize profits from the sale of their products, it is inevitable that the actions of such industries will at times be in conflict with the mission of scientific associations and the integrity of research scientists. On the other hand, public bodies such as governmental agencies or ministries should have a goal of public benefit and operate in a transparent and accountable way, notwithstanding the fact that they may also be subject to or influenced by political direction or considerations.

Decisions on accepting funding from such organizations should take careful account of the likelihood of contributing to public harm, through increased product sales, or industry influence on policymaking by doing so. Secondly, such decisions should consider the risks to the organization itself, its reputation, or that of its members and ATOD science more generally of accepting funding that could lead to a perception or allegation of bias.

Further guidance is provided below to support decision-making.

### **3. Risks and benefits from a societal perspective**

Alcohol, tobacco and other drugs are a major contributor to mortality and morbidity worldwide <sup>3</sup>, through direct effects on consumers via non-communicable diseases and accidents, as well as broader effects ranging from the harms of second-hand smoke, to interpersonal violence, dependence and a variety of harms to children, families and relationships. Alcohol and tobacco are produced and promoted by powerful and highly profitable multinational business complexes <sup>4</sup> which includes producers, distributors, trade associations, legal and public relations organizations, as well as social and public aspects organizations .

The pharmaceutical industry is active in producing substances that are intended to alleviate suffering from diseases and other disorders. Some of these are highly addictive e.g. opioids and benzodiazepines. Researchers and others involved ICARA member organizations may have contact with the pharmaceutical industry as the producer of drugs to treat alcohol or drug dependence, or with individuals who are dependent on the drugs they produce. Recent developments such as legalisation of the use of marijuana for medical and/or recreational purposes, and the granting of a medicines licence to a brand of electronic cigarette produced by a tobacco-industry-owned company are examples of processes that blur the distinction between medicines and drugs of abuse, and the varying industries that produce them.

The activities of the tobacco industry succeeded in avoiding, delaying or minimizing regulation that could have prevented millions of people from smoking and ultimately suffering or dying from tobacco-related illnesses. Several systematic reviews have documented the tactics used by the tobacco industry to avoid regulation, and these include attempts to ‘shape’ the evidence base through the funding of scientists, the creation of alliances with other organizations, and the commissioning of technical reports <sup>5</sup>. Alcohol industry tactics have included selective citation of industry-favorable evidence, omission of evidence, and contesting the nature of evidence. These tactics are used to distract, distort and/or discredit scientific evidence to avoid regulation that might adversely affect industry profits <sup>6-8</sup>.

The pharmaceutical industry has been criticised for failings in published clinical trials, a failure to publish negative clinical trials, contributing to overdiagnosis through medicalisation and disease-mongering, and overprescribing <sup>9-11</sup>. The activities of the industry are facilitated in part through the funding of ‘key opinion leaders’ to conduct trials and write papers with funding from the company <sup>12</sup>. Multiple reviews have found that studies funded by the industry are more likely to yield results favourable to the industry, than when funding comes from other sources <sup>13-15</sup>. Furthermore, pharmaceutical companies have been fined for mis-selling and off-label promotion and for criminal activity including bribery <sup>16,17</sup>.

Where organizations have an unfavorable reputation, they may gain respectability by associating themselves with scientists and reputable ATOD research associations. Even if funding or support is unrestricted, there may be indirect consequences if the funder uses their involvement to rehabilitate their reputation, enhance their credibility as a funder of science, or gain influence with policymakers. This may result in public policies that are less effective in reducing ATOD-related harm.

### **4. Risks and benefits from the perspective of the ATOD association**

The potential benefits of sponsorship or funding for ATOD associations may seem clear, in that resources are provided to support the activities or aims of the association. Where there is an alignment between the aims of the sponsor and those of the association, sponsorship arrangements

may provide mutual benefit. Even in such cases however, the relationship should be managed carefully and transparently (see Section 5 below), and it should not be assumed that the goals of sponsoring organizations are those that are publicly stated.

In all cases of sponsorship or funding by vested interests, and in particular those of private enterprises, there is at least the risk that ATOD associations (a) be seen as endorsing the sponsor, its positions, activities or industry more broadly, (b) lose their credibility as independent and unbiased sources of scientific evidence and public health advice; or (c) become influenced in a certain direction.

- (a) **Perceived Endorsement:** Firstly, the acceptance of sponsorship carries a risk of potentially being seen to be endorsing the sponsoring organization, its products, policies and activities; or the industry of which it is part (e.g. the alcohol industry). In accepting the funding arising from the profits of an industry whose products are known to be harmful, the association or researcher may be seen as profiting from public harm. The sponsoring organisation gains in respectability by virtue of providing the sponsorship (as discussed above). Furthermore, the association may inadvertently lend credibility to the industry positions on policy, that are often inconsistent with published peer-reviewed evidence.
- (b) **Reputational Damage:** Secondly, researchers and research organizations that accept funding from industry sources, risk being perceived as biased in their activities and jeopardise their credibility and reputation as independent scientific associations. This may have implications for their role in future policy debates. Individuals involved with the association may similarly find that the acceptance of funding may lead to reputational damage and preclude involvement in certain committees (e.g. WHO).
- (c) **Bias or Conflicts of Interest:** Thirdly, sponsorship, funding or other relationships with vested interests organisations may lead to actual conflicts of interest and biases (conscious or unconscious) that affect the integrity and/or direction of ATOD science. Sponsors may be selective in the programs they fund, supporting only projects that are consistent with their view of how ATOD problems should be addressed. These are projects where likely findings will not impinge on sales or profits. Where resources are not plentiful, sponsorship can shift the balance of focus within an organization onto funded activities relating to the sponsor's interests, leaving less time for the officers or volunteers of the association, or those organizing conferences to focus on other issues. This therefore biases the focus towards the preferred interventions and worldview of the sponsor. Finally, there is evidence that even unrestricted financial support may lead to individuals unconsciously adjusting their decision-making towards the funder's position.

Whilst considered lower risk, associations should also be mindful that not-for-profit organizations, including governmental agencies, may also influence the activities of ATOD researchers and organizations. Where such funding is unrestricted, it is considered low risk, however some funding contracts have been found to have secrecy clauses and several researchers have reported interference in their research from government agencies<sup>18</sup>. The guidelines in Section 5 should help to manage relationships with all funders and sponsors, not just private enterprises.

## 5. Managing relationships with vested interests organizations

Bearing in mind the varied and substantial nature of potential risks involved, ICARA recommends that its member organizations adhere to three primary principles in making decisions on relationships with funders and organizations with vested interests.

- (a) **Due Diligence:** The association should seek to fully understand the risks of the proposed arrangement by establishing clear information on the proposed sponsor or funder, their aim, function and political activities, the original source of funding, and proposed conditions

(informal or contractual) governing the arrangement. Consideration should be given not only to the individual organization offering support, but the broader grouping or industry of which they may be part.

- (b) **Open Decision-Making:** The association should promote a thorough and open discussion on the ethical and practical implications related to this type of funding at the level of the board of the association and amongst members and develop general guiding principles and procedures. This should consider the advantages and disadvantages of funding from various sources, the degree of influence by the sponsoring organization which is acceptable to members; and the risks to the association's credibility and focus as outlined above. The agreed policy/principles should then guide future decision making.
- (c) **Transparency in All Relationships:** Agreed policies and procedures, and all types of funding or other arrangements with external organizations, and any related conditions and limitations, should be declared in a transparent manner to the society members and to the general public.

Further advice on implementing these three principles is provided below.

#### **(a) Due Diligence**

When considering whether or not to develop a relationship with, or accept support or funding from any organization, ICARA members are encouraged to find out as much as possible about the organization.

- i. Where does the offered funding come from? Follow the funding trail to identify the original source of funding or in-kind support for the organizations activities.
- ii. Has the funding been made available through compulsory taxation or a levy, or through voluntary contributions on ATOD businesses? If so, what is the involvement of the ATOD industry in decisions about funding allocation?
- iii. What are the aims of the organization offering support? What are the aims of the original funding provider (the funding source)? Are these aims similar to or in conflict with the aims of the research organization?
- iv. Consider the reputation and activities of the sponsoring body, and whether there is a risk in being associated with that organization - see examples above regarding the alcohol and tobacco industry. A risk assessment such as that of the World Obesity Federation may be necessary for some organizations
- v. What management or contractual arrangements (formal or informal) are proposed and how is the integrity and independence of the organization to be assured? Is the funding restricted or unrestricted? Are there any restrictions on communication? Any type of limitation of the freedom of a society to execute or communicate its work independently should be discussed carefully.
- vi. How will the funding be acknowledged in a way that ensures transparency but avoids promoting the sponsor's products (logos or branding) or preferred policy positions where they are not aligned with those of the ATOD Association?
- vii. How will the funder be permitted to describe the arrangements to others?
- viii. How well do the proposed activities to be funded align with WHO priorities and best buys for relevant policy? Is there evidence to support the likelihood of the supported activities leading to reduced harm from ATOD?
- ix. What proportion of the society's income will be derived from the sponsoring arrangement? Associations should monitor this to avoid becoming overly dependent on any funder(s).

#### **(b) Open Discussion & Policy Development**

- i. The information established during the Due Diligence process should be made fully available to members and the governing bodies of the ATOD association.
- ii. The board or officers of the Association should consult openly with members about the risks, benefits and ethics of accepting support or funding from organizations with vested interests, taking into consideration the points made in this guidance above.
- iii. Each association should develop a **written, publicly accessible policy** on accepting funds from organizations with vested interests, and this policy should be available for society members and the public. Organizations may wish to develop different procedures for specific industries or organization types, for different amounts of funding, or for different types of collaboration. The World Obesity Federation policy provides an example of this kind of 'triage' system for decision-making (see <http://www.worldobesity.org/who-we-are/what-we-stand-for/financial-engagement-policy/>) .
- iv. Associations should have a process in place for the management and declaration of conflicts of interest for members, attendees, and presenters at Association events.
- v. Associations should develop policy on the management of conflicts of interest in the governance of the organization (board members, working group chairs, active representatives of the Association). One example of this would be that board members with declared interests relating to an industry or company should not participate in decision-making about the involvement of that industry or company in Association business. Another is that the ICARA member INEBRIA does not permit members with any alcohol industry funding in the previous 5 years from sitting on its co-ordinating committee [http://inebria.net/wpcontent/uploads/2016/02/position\\_statement\\_on\\_the\\_alcohol\\_industry.pdf](http://inebria.net/wpcontent/uploads/2016/02/position_statement_on_the_alcohol_industry.pdf) .
- vi. Associations may wish to consider establishing an independent ethical advisory committee to advise the Board on policy and decision-making in relation to these matters or to adjudicate on individual cases where necessary. Members of this committee should be independent of the governance of the Association, or non-members if possible, and themselves without conflicts of interest.

### (c) Transparency

- i. The policies and procedures agreed above should be made publicly available and all members should be made aware of them.
- ii. Any arrangements for funding, sponsorship or in-kind support from organizations with vested interests must be transparently and publicly declared. No agreements should be entered into that prevent or impede this transparency. Associations may also wish to make public any decisions to decline to enter into such arrangements and the reasons for the decision.
- iii. Where a funder has any input into outputs from funded activity, such input should be openly declared.
- iv. An annual report of sponsored activities should be made available to members and published.
- v. Members should have access to the declarations of interest of Board members, officers or representatives of the Association
- vi. COI statements for conference presentations or any inputs to meetings or events should be easily accessible to those attending the event e.g. accompanying abstracts.
- vii. For all sponsored activities and all sponsoring organizations, a written agreement should be available fulfilling the following criteria:
  - Name of the sponsor including possible background of sponsoring organizations
  - Description of the sponsored activity and aims
  - Budget and financial share for the activity

- Rights and restrictions agreed for the ATOD Association as well as for the funding organization including in relation to public relations
- Regulations for premature termination of the arrangements or funding

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