



GLOBE

GLOBAL CENTRE FOR
PREVENTIVE HEALTH
AND NUTRITION



Global Centre for Preventive Health and Nutrition (GLOBE)

External Relations Guidelines

Version 2.0

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Updates to latest version include:

- Reference to updated Deakin policies (Table A1), and inclusion of reference to nicotine products and gaming
- How the Committee makes recommendations

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Introduction

The Global Centre for Preventive Health and Nutrition (GLOBE) is a research group based in the Institute for Health Transformation (IHT), in the Faculty of Health at Deakin University. GLOBE is a designated World Health Organization (WHO) Collaborating Centre for Obesity Prevention. The vision of GLOBE is to catalyse improvements in population health, with a focus on prevention, nutrition, and obesity, through innovative research that empowers people and enables healthier environments.

This document sets out guidelines for GLOBE members (including staff and affiliated students) in relation to declaring and managing conflict of interest (COI) when carrying out activities in pursuit of the GLOBE vision. GLOBE members are advised to consider the guidelines presented in this document prior to and during the course of engagement with a party external to GLOBE, including commercial entities, non-government organisations (NGOs), government agencies and other researchers (both at Deakin University and externally).

The guidelines presented in this document are to be applied in conjunction with general guidelines and codes of conduct for undertaking research in Australia and at Deakin University specifically (refer to Appendix 1), and the guidelines¹ that govern the types of engagements that GLOBE is able to enter into through its designation as a WHO Collaborating Centre. When a project is covered by multiple guidelines and codes of conduct (including funder or partner specified) the more stringent guideline or code is to be followed where differences occur.

The guidelines were developed based on the WHO Guidelines for managing COI in relation to nutrition programmes,² and the World Obesity Federation Financial Relationship Policy,³ with modifications to reflect the specific goals and context of GLOBE. It is envisaged that the GLOBE External Relations Guidelines will be reviewed every 12 months.

Principles for engagement with organisations and individuals external to GLOBE

1. External parties should not curtail the academic freedom of GLOBE researchers.
2. GLOBE's research agenda should be determined based on public health priorities and policy-relevance.
3. Development and application of research methods are the responsibility of GLOBE researchers, in consultation with external parties where appropriate.
4. Study results should be published in ways that avoid disclosure of commercial-in-confidence information.
5. For GLOBE-led projects, GLOBE researchers retain full control over the decision to publish study findings and the specific results presented. Publication decisions should not be guided by commercial considerations.

¹ <http://www.who.int/collaboratingcentres/information/en/>

² <https://www.who.int/nutrition/consultation-doi/comments/en/>

³ <https://www.worldobesity.org/resources/resource-library/financial-relationship-policy>

6. For GLOBE-led projects, external parties have no influence on how GLOBE publicises research findings.
7. Processes need to be established to ensure that GLOBE approves use of GLOBE/IHT/Deakin branding as part of any public communications from external partners (including communications that include partner logos alongside the GLOBE logo).
8. Deliberate non-compliance with recommendations based on these guidelines jeopardises the reputation of GLOBE and/or its WHO Collaborating Centre designation and may carry implications related to the researchers' ongoing membership with GLOBE.

Definition of conflict of interest

For the purposes of these Guidelines, a broad conceptualisation of COI is taken. The Guidelines are designed to cover perceived, potential and actual COI, at both the institutional and individual levels:

- An institutional COI describes a situation in which the interests of an external institution or an employee of an external institution acting within his or her authority on behalf of the institution, may affect or appear to affect the activities of a second institution. Institutional COI is of particular concern when financial interests create the potential for inappropriate influence over the institution's activities.⁴
- An individual COI, in this research context, refers to situations in which an individual's financial or other personal considerations may compromise or appear to compromise the integrity of their research and/or the reporting of the research.⁵

Process for assessing and managing external relationships

GLOBE members need to consider COI at all stages of the research process, including initial conceptualisation of ideas and collaborations, through to dissemination and knowledge exchange.

GLOBE has established an External Relations Committee to provide guidance to GLOBE members regarding the identification of COI and ways to manage COI when engaging with parties external to GLOBE.

The External Relations Committee should be consulted as early as possible in the process of engaging with parties external to GLOBE. Importantly, final decisions regarding engagement with parties external to GLOBE are made by individual researchers, with reference to these Guidelines and in consultation with the Director/s of GLOBE, not by the GLOBE External Relations Committee.

⁴ Definition adapted from:

https://medschool.duke.edu/sites/medschool.duke.edu/files/field/attachments/icoi_implementation_document.pdf

⁵ Definition adapted from:

<https://ori.hhs.gov/education/products/ucla/chapter4/default.htm>

The GLOBE External Relations Committee consists of EMCR co-chairs, two senior GLOBE researchers, the GLOBE research manager, the IHT partnership manager, and the GLOBE directors. The co-chairs are responsible for triaging applications, initial review, and scheduling meetings for committee assessments, as well as follow up of applications for high-risk engagements (or where the engagement is pursued despite a Committee recommendation not to engage).

If a committee member is a researcher listed on the application, they recuse themselves from the review process. If the GLOBE Director is directly involved in the engagement under discussion, final decisions regarding the project should be referred to the Director of IHT, the Head of the School of Health and Social Development (HSD) or the Executive Dean of the Faculty of Health (as appropriate).

When GLOBE and/or GLOBE members propose to engage with parties external to GLOBE, a risk/benefit assessment (refer to Appendix 2) of the potential relationship should be conducted. The risk/benefit assessment process should consider the potential benefits of the engagement, and weigh these up against the potential risks to GLOBE and the individual researchers involved.

The risk/benefit assessment should consider:

- a) The characteristics of the organisation and affiliations/relationships of the party with whom GLOBE is considering an engagement.
- b) The type of engagement that might be entered into and the potential benefits and risks to the reputation of individual researchers, GLOBE, IHT and, more widely, Deakin University.
- c) The extent to which engagement is necessary to meet the desired goals of the engagement.

Characteristics of the external party

Table 1 classifies external organisations into four tiers, based on the associated risks to GLOBE. The classification structure is based on a range of factors, including alignment to public health goals, potential risks to GLOBE, and the nature of the research conducted by GLOBE. Where an individual researcher is in doubt about the category in which an organisation should be classified, the GLOBE External Relations Committee can provide guidance.

Table 1. Classification of external organisations

Tier	Characteristics of external organisation
Tier 1	<ul style="list-style-type: none"> • The tobacco industry, including: companies directly engaged in the production, manufacture, distribution, and selling of tobacco/nicotine or tobacco/nicotine products (including e-cigarettes) ⁶ • The alcohol industry, including: companies directly engaged in the production, manufacture, distribution, and selling of alcohol products ⁷ • The gambling and/or gaming industry • The weapons/armaments industry • Political parties • Industries substantially involved in illegal activities • NGOs (e.g., philanthropic organisations, community groups, think tanks) that receive a substantial degree (e.g., more than 10%) of their revenue/funding from or that have substantial links (e.g. through governance arrangements, registered lobbyist) to any of the above-mentioned (Tier 1) sources
Tier 2	<ul style="list-style-type: none"> • Food and non-alcoholic beverage manufacturers (including related associations and peak bodies), excluding those focused exclusively on fruit and vegetable products • Food service providers (including quick service restaurants, cafés, full-service restaurants and caterers – as well as related associations and peak bodies), excluding those focused exclusively on fruit and vegetable products and/or where food provision is not the primary purpose of the organisation • Supermarkets and general food retailers (including related associations and peak bodies) • Food distributors (including food importers, exporters, aggregators and online food delivery), excluding those focused exclusively on fruit and vegetable products • Food growers and the agricultural industry (including related associations and peak bodies) • The pharmaceutical industry, including manufacturers or retailers of pharmaceuticals or medical equipment⁸ • Producers of weight management and/or weight loss services and products (including meal replacement products) • Large professional services/consulting companies (e.g., >50 employees), including ‘The Big Four’ • NGOs (e.g., philanthropic organisations, community groups, think tanks) that receive a substantial degree (e.g., more than 10%) of their revenue/funding

⁶ Supermarkets and other general retailers that sell tobacco products as part of a much broader product range are not included here

⁷ Supermarkets and other general retailers that sell alcohol as part of a much broader product range are not included here

⁸ Due to the activities of the pharmaceutical industry, GLOBE adopts a precautionary stance as it presents more nuanced considerations. Accepting funding directly from the pharmaceutical industry is not recommended, and indirect funding through philanthropic bodies that receive income from the pharmaceutical industry will be evaluated on a case-by-case basis.

	from, or that have substantial links (e.g. through governance arrangements, registered lobbyist), to any of the above-mentioned sources
Tier 3	<ul style="list-style-type: none"> • Food manufacturers/growers, distributors and/or retailers focused exclusively on fruit and vegetable products • Private health service providers, health insurance companies • Sport and fitness clubs, and sporting goods manufacturers • Automobile industry, road building industry, automobile fuel companies • Property development companies • Small-medium professional services/consulting companies (e.g., <50 employees) • NGOs (e.g., philanthropic organisations, community groups, think tanks) that receive a substantial degree (e.g., more than 10%) of their revenue/funding from or that have substantial links (e.g. through governance arrangements, registered lobbyist) to any of the above-mentioned sources
Tier 4	<ul style="list-style-type: none"> • Government departments, public authorities and government agencies • Universities and research institutes • Other NGOs, professional associations, private sector organisations and philanthropic organisations not included in other tiers

Engagement type

The type of engagement with external parties will be classified into four risk categories, based on the nature and extent of engagement:

High risk:

- Financial contribution to a research project or GLOBE initiative
- Substantial (e.g. >\$1,000) in-kind contribution to a research project or GLOBE initiative (including provision of data and/or resources, meeting rooms)

Medium risk:

- Financial contribution for a GLOBE member to attend a meeting or event, including honoraria or gifts
- Minimal (e.g. <\$1,000) in-kind contribution to a research project or GLOBE initiative

Low risk:

- Joint authorship of an academic paper / report with a representative of the organisation
- Engage in formal dialogue with a representative of the organisation
- Other formal collaborations e.g., joint positions on a committee or think tank, joint submissions to enquiries

Minimal risk:

- Joint authorship of an academic paper / report with an individual (e.g. a researcher) that has accepted funding, published with, or has other substantial past or present associations with Tier 1 and 2 organisations
- Attend a meeting or event hosted by the organisation

Risk assessment matrix

Once the external organisation has been categorized and the risk level of the proposed engagement has been identified, applications will be mapped to the matrix presented in **Table 2** to determine next steps.

Where a risk/benefit assessment is conducted, decisions should be made about whether to proceed with the engagement and the risk management processes that need to be put in place. For ongoing engagements, the risk/benefit assessment should be repeated once the nature of the engagement has been determined and approximately every 12 months.

Where a risk/benefit assessment is sent to the Committee for assessment, it will first be reviewed by the co-chairs. If the co-chairs believe that no assessment is required by the full GLOBE External Relations Committee, the co-chairs will draft recommendations and return them to the applicant, cc'ing all other committee members.

Where the co-chairs decide that an assessment is required by the full Committee, the co-chairs will either a) draft initial recommendations, which are then sent to all other committee members for review and input, or b) for complicated or higher risk applications a full committee meeting will be scheduled to discuss the application and draft feedback. Once the committee members agree on final recommendations, these are then returned to the applicant, cc'ing all other committee members. Efforts will be made to reach consensus on committee decisions. Where this does not occur, the committee will reconvene for further discussion. If agreement still cannot be reached, the decision will be discussed with the IHT Director and/or Executive Dean of the Faculty of Health for further advice.

Table 2. Risk matrix guiding actions required for GLOBE engagement

Type of engagement	Classification of external party (see Table 1)			
	Tier 1	Tier 2	Tier 3	Tier 4
High risk <ul style="list-style-type: none"> - Financial contribution to a research project or GLOBE initiative - Substantial (e.g. >\$1,000) in-kind contribution to a research project or GLOBE initiative (including provision of data and/or 	Do not engage	Prepare risk/benefit assessment (Appendix 2) and refer to full GLOBE External Relations Committee for assessment. ⁹ Ongoing updates to the Committee may be required.	Prepare risk/benefit assessment (Appendix 2) and refer to GLOBE External Relations Committee co-chairs for assessment.	Individuals to be aware of potential COI, no assessment required.

⁹ It is likely to require only a very special set of circumstances and very strong potential benefits for the GLOBE COI Committee to endorse a financial contribution from a Tier 2 party.

resources, meeting rooms)				
Medium risk <ul style="list-style-type: none"> - Financial contribution for a GLOBE member to attend a meeting or event, including honoraria or gifts - Minimal (e.g. <\$1,000) in-kind contribution to a research project or GLOBE initiative 	Do not engage	Prepare risk/benefit assessment (Appendix 2) and refer to GLOBE External Relations Committee for assessment. Ongoing updates to the Committee may be required.	Individuals to be aware of potential COI, no approval required.	
Low risk <ul style="list-style-type: none"> - Joint authorship of an academic paper / report with a representative of the organisation - Engage in formal dialogue with a representative of the organisation - Other formal collaborations e.g., joint positions on a committee or think tank, joint submissions to enquiries 	Prepare risk/benefit assessment (Appendix 2) and refer to GLOBE External Relations Committee for assessment.	Prepare risk/benefit assessment (Appendix 2) and refer to GLOBE External Relations Committee for assessment.	Individuals to be aware of potential COI, no approval required.	

<p>Minimal risk</p> <ul style="list-style-type: none"> - Joint authorship of an academic paper / report with an individual (e.g. a researcher) that has accepted funding, published with, or has other substantial past or present associations with Tier 1 and 2 organisations - Attend a meeting or event hosted by the organisation 	<p>Prepare risk/benefit assessment (Appendix 2) and refer to GLOBE External Relations Committee co-chairs for assessment.</p>	<p>Prepare risk/benefit assessment (Appendix 2) for own records, no assessment required from GLOBE External Relations Committee</p>	<p>Individuals to be aware of potential COI, no approval required</p>
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Sample risk management strategies

A range of risk management strategies can be adopted to manage risks associated with COI.

At a broad level, GLOBE will manage risk by:

- Publishing the percentage of funding received by GLOBE members from all types of funding sources on the GLOBE website, including specific details of any funding from Tier 1 and Tier 2 organisations (if relevant).
- Publishing a list of major ongoing partners (including organisations that have made 'in-kind' contributions) for GLOBE projects and initiatives on the GLOBE website.
- Summaries of all decisions made by the GLOBE External Relations Committee will be communicated with GLOBE members annually.
- Adopting strong quality control processes (including internal and external peer review, as appropriate) with respect to research conducted
- Regular meetings with GLOBE Directors / External Relations Committee to monitor engagement. An update on committee activities will be communicated to the GLOBE Executive Team each quarter.

In regard to specific engagements, strategies may include:

- Governance processes that ensure research independence as part of collaborative projects
- A decision not to accept financial contributions for a particular engagement
- Transparent Memorandums of Understanding (MOUs) with any partner organisations that highlight the need for research integrity in all aspects of engagement, including research design, analysis and dissemination
- Clauses in agreements that limit the use of the Deakin/GLOBE name for promotional purposes
- Full disclosure and transparency of funding arrangements and potential COI as part of publications/presentations

High risk and complex relationships may require ongoing consultation or periodic updates to the GLOBE External Relations Committee regarding project status. Where this is required, this will be clearly communicated to the applicant, with the GLOBE research manager responsible for following up.

Appendix 1: Relevant Deakin University Guidelines

Deakin University has a Conflicts of Interest Procedure, available here: [Declaration of Interest Procedure](#).

Deakin University also has a [Research Conduct Policy](#), that is based on the [Australian Code for the Responsible Conduct of Research](#). The Australian Code for Responsible Research is jointly issued by the National Medical and Research Council, the Australian Research Council and Universities Australia and outlines general principles and practices for institutions and researchers to engage in responsible research.

[Deakin University's Research Conduct Policy](#) covers principles around: Social Responsibility, Research Integrity, Health and Safety in Research, Management of Research Data and Primary Materials, Supervisors and Research Students, Publication and Dissemination of Research, Authorship, Peer Review, Conflicts of Interests, Collaborative Research, Conscientious Objection, Research Code Breach and Serious Research Code Breach. Key highlights of the document relating to Social Responsibility and the External Relationships Policy are presented in **Table A1**.

Table A1. Extracts from Deakin University's Research Conduct Policy and External Relationships Policy

<p>Research Conduct Policy- Social Responsibility</p> <p>These are the relevant extracts from the full policy which can be found here.</p>	<p>The University is committed to supporting a culture and environment that promotes and fosters the responsible conduct of research.</p> <p>The University will not accept funding for research from, or enter into any partnership or other arrangements with organisations as proscribed in the External Relationships policy.</p> <p>The University will not engage in research that leads to the proliferation of military end use goods or weapons of mass destruction and adhere to Australia's Export Controls, as proscribed by the Defence Trade Controls procedure.</p> <p>The University will implement measures to ensure adherence to the United Nations Security Council (UNSC) sanctions regimes and Australian autonomous sanctions regime.</p>
<p>Research Conduct Policy- Responsible Research Conduct</p> <p>These are the relevant extracts from the full</p>	<p>(13) Researchers will foster and support a research culture of honesty, respect, accountability, and transparency through compliance with all relevant laws, regulations, disciplinary standards, ethical guidelines and institutional policies related to responsible research conduct.</p> <p>(14) In demonstrating responsible research conduct, researchers will:</p>

<p>policy which can be found here.</p>	<p>a. adhere to the principles and responsibilities of Australian Code for the Responsible Conduct of Research 2018 and the University's research integrity standards.</p> <p>d. ensure appropriate approvals are obtained prior to commencement of research and adhere to the relevant Procedures if their research involves:</p> <p>vii. partnerships with organisations that require Commonwealth approval under the Australia's Foreign Relations (State and Territory Arrangements) Act 2020</p> <p>j. disclose and manage any actual, potential or perceived conflicts of interest relevant to their proposed or ongoing research according to the Declaration of Interest procedure.</p>
<p>External Relationships and Partnerships policy</p> <p>These are the relevant extracts from the full policy which can be found here.</p>	<p>Prohibited Partnerships</p> <p>(15) Consistent with the University's values and strategic objectives, the University will not enter into partnerships with entities from the following industries:</p> <ol style="list-style-type: none"> 1. tobacco, being any entity that directly or primarily engages in the production, manufacture, sale, promotion or marketing of nicotine, tobacco or tobacco products as their primary business or an entity that is funded primarily by the tobacco industry; or 2. gambling and gaming. <p>(16) Partnerships with entities that operate primarily within the alcohol industry will be considered on a case-by-case basis and may only proceed with the written approval of the Vice-Chancellor, with input from other relevant Executive members.</p> <p>International Partners</p> <p>(17) Any partnership that involves an international partner, whether under clauses 8 or 11-12, must comply with the International Relations Regulation policy. When proposing a new partnership or managing a current partnership, staff should consider the rules and guidance provided under that policy.</p>

Appendix 2: Risk/benefit assessment template

Project/engagement title	
Nature of proposed/existing engagement	
Value of financial or in-kind contribution	
GLOBE members involved (please also include staff and students who will carry out the activities)	
Name of other party/parties involved	
Key activities of the external party/parties	
Funders/revenue sources of the external party/parties (if applicable)	
Core values / strategic goals of the external party/parties, and degree of alignment with public health goals and GLOBE's vision	
Proposed benefits for GLOBE	
Potential risks to GLOBE	
Risk management strategies in place or proposed	
Other considerations	

Appendix 3: External relations committee recommendation template

GLOBE External Relations Committee - Response	
Project/engagement title	
Committee members involved in deliberation	
Recommended outcome	
Determined risk level:	
Determined organisation tier:	
Considerations made for recommendation	
Next steps required	
Committee recommendation: (including reference to appropriate sections of GLOBE External Relations guidelines)	