

Type of conflict	Description	Possibly preventive actions and controls	Possibly detective actions and controls	Comments
I. Outside engagements/employment (Any kind of paid or unpaid engagement with a company that might influence HCP's business judgement or impacts their performance at HCO)	a) outside employment	1) Prior to start of employment any employee of the target group (Senior Management, Procurement, Artzte, Oberarzt etc.) should sign a declaration that they do not have any outside engagement (or outside engagements whereas the type of outside engagements that need to be disclosed must be defined) and/or declare them 2) In case the employee has an outside engagement prior to joining the HCO, then such outside employment must be approved prior to start employment 3) During employment any time an employee's situation changes, the employee must disclose the outside employment/engagement and get it approved before making any (outside) commitments. Ideally a software solution exist with following functionalities a) employees can disclose their conflict of interest in various drop down menus b) electronic approval workflow is build into the software c) annually reminders can be sent d) management reports can be generated on type of conflict of interests, per department etc.		Additional functionalities on software solution would be: Realtime check with transaction within organization such as Purchase order and /or contracting on specific account and relation with employee or his department were a operative review/approval flow or mitigation check would be in place -> might be valid for most COI cases
I. Outside engagements/employment (Any kind of paid or unpaid engagement with a company that might influence HCP's business judgement or impacts their performance at HCO)	b) consultancy agreement	1) Prior to start of any consulting agreement the employee must disclose and obtain approval prior to accepting the consultancy engagement 2) HCOs should have a policy/statement that defines, whether the money received through consultancy agreements can be kept by doctor and/or whether this money need to be provided to healthcare organization 3) train your suppliers on your company's conflict of interest policy	Review the annual disclosure statements made public by pharma companies and verify whether any HCPs are listed as having provided consultancy services	Consultancy activities must be limited in time (e.g. max. 50h per year)
I. Outside engagements/employment (Any kind of paid or unpaid engagement with a company that might influence HCP's business judgement or impacts their performance at HCO)	c) member of advisory boards	see consultancy agreements	Mainly via self declaration, responsibility and ethical behaviour leads to appropriate mitigation of COI- see also consultancy agreements	
II. Personal financial interest	a) Ownership of substantial interests in any company that does business with HCO.	1) Request to doctors, oberarzt etc. to disclose any financial interests taken in companies. 2) The immediate supervisor must ensure that - when decisions are to be made regarding doing business with those companies in which the doctors, oberarzt has a financial participation that he/she is excluded from the decision making. Terms like "substantial interest" must be defined in internal policy and also whether or not only interests in stock quoted companies or all sorts of financial interest must be disclosed. E.g. in USZ interests must be disclosed if the participation/interest exceeds a certain percentage of a person's wealth ("Eigenvermögen"). The hospital should consider upper limits up till when a financial participation is acceptable and from what point onwards the participation becomes problematic.		
II. Personal financial interest	b) The authorization to use (or not) the HCO assets (e.g. using rooms, computers or HCO clinical data) for private purposes	1) The conditions under which the use of HCO assets can be used for private purposes or not should be specified in a policy 2) a process for disclosure must be defined and 3) the approval must contain the conditions under which such company (hospital) assets can be used for private purposes must be logged -See also outside employment.	1) From IT perspective checks can be done whether emails or other company data are send by a doctor/employee to an external/private email address 2) Consistency checks can be done e.g. if an explanation needs to be given and recorded why certain rooms or computers are used, then reports can be run on the frequency when this is happening and potential conflict of interests can be detected.	
II. Personal financial interest	c) Taking advantage of inside information regarding a listed company (start-up) which has paid HCP with stocks instead of cash	a) HCO should have a policy on what is considered insider information b) providing training on insider trading c) have a policy on what is restricted and secret information d) have all files have a heading with the respective information classification	Monitoring of files /emails send to private email addresses	
II. Personal financial interest	d) Undisclosed payments to HCPs for enrolling patients in clinical trials	Have a policy and train CROs that any payments should happen to bank account of HCO only instead of HCP		
III. Gifts	Gifts, meals, travel, entertainment paid by company.	The HCO should have a gift policy defining what gifts and hospitality can be provided to business partners and what gifts/hospitality can be accepted.	Sample check of expense reports for transactions exceeding gifts/hospitality threshold; review of company credit card transactions for unusual transactions	Based on VITH and PK gifts not allowed (anymore since 2020). Business Courtesies limited by VITH and PK to the limit of 100 CHF but only for "Fachgespräch". Travel for Educational Support (eg. Int. Congresses) are allowed to fund, entertainment shall be limited. 2 Challenge of Policy might be to define; Keine nicht gebührenden Vorteile sind: a. Vorteile von bescheidenem Wert, die für die medizinische oder pharmazeutische Praxis von Belang sind; The challenge might be the HCO might align to VITH and probably PK (?)
IV. Personal relationships	1) Conduct HCO business with closely related persons employed in company	1) the conflict of interest policy should cover this aspect. Typically family members or related family members can not have a direct reporting line to each other as this would jeopardize their independence during recruitment, during annual performance evaluation, bonus decisions etc. 2) any conflict interest must be disclosed, approved and mitigating measures must be taken	HR to monitor employee database for similar addresses or family relationships	
IV. Personal relationships	2) Son or daughter of Arzt or Oberarzt is getting a position in the company with "strong recommendation" from HCP	Any decisions on recruitment should be taken independently by a recruitment panel consisting of line manager and HR		
V. Independence in research	3) Clinical studies on pharmaceuticals of companies HCP has a substantial interest or any kind of paid or unpaid engagement	1) Declaration of conflicts of interest prior to start of studies by every member of study-team would be mandatory 2) the conflict of interest must be approved and mitigating measures must be initiated		
V. Independence in research	4) Board membership of HCP in a foundation that funds trials or studies of HCO and receives funds from industry	HCO should have a policy regarding the funding of trials by foundations as well as employee's membership in boards of foundations	cross-check and monitoring of commercial registry entry of the foundation (are any HCP listed as board members?)	
V. Independence in research	5) Executive or board position of HCP in a joint-venture by HCO and industry (start-up, spin-off)	HCO should have a policy regarding the handling of employee's membership in boards of joint-ventures	see above	
V. Independence in research	6) the Arzt/Oberarzt has conducted/written the research but has been paid/incentivised to come to a specific result	Best practice is to have research been reviewed by (independent) peers to avoid such situations to happen.		
VI. Ghostwriting	HCPs that are being paid to put their name in a medical journal and get paid for this even though they did not write research	Many of the conflicts of interest can be avoided by having a policy on what are the standards to be applied when writing in a medical journal, mandatory references to source data, no "plagiat", not allowing Professors or Doctors to take credit for the work done by students or assistants.		
VII. Procurement	1) Not selecting the "best vendor" e.g. when buying (radiology) equipment	The HCO should have a procurement policy describing who can create/approve purchase requisitions, purchase orders, when a RFP is needed, when public tender is needed etc. Clear criteria (quality, price, service level etc.) should exist prior to making a decision on a supplier. Compliance-declaration of procurement team is requested by (new) law.		Additional preventive to put on a substantial threshold to force competitive bid quotes for requestors/business to ensure more objective comparison between products/services to reduce/mitigate COI
VII. Procurement	2) Arzneikommission or Medikamentenkommission is not existing	An Arzneikommission or Medikamentenkommission defines the business need, based on scientific criteria, whether certain (new) medicines will be put on the "sourcing list". By having such formal body/gremium any conflict of interests regarding buying unnecessary products or services would be avoided.		
VII. Procurement	3) Procurement is not involved in sourcing decisions	a) Ideally a procurement policy exist that states that Procurement must be involved in all procurement decisions	Review of supplier invoices without purchase orders, purchase orders after the fact, split purchase orders etc.	Additional preventive to put on a substantial threshold to force competitive bid quotes for requestors/business to ensure more objective comparison between products/services to reduce/mitigate COI
VIII. Public procurement contracts/tenders	HCPs in HCO working with specific pharma companies to write a tender in such a way that only pharma company X can win	a) training of employees on conflict of interest b) an independent gremium defines the criteria for RFP (rather than single Procurement or sourcing individual to ensure that specific suppliers would win the RFP because of relationships between the sourcer/procurement of Hospital and suppliers)	ideally a segregation of duties exist between those employees who define the business requirements in a tender and those who take decisions on attributing a tender to a given company	Need of self declaration for employees per highest level of policy