



Consultation Process on Conflict of Interest in the SUN Movement

Final Report

April 2015



The Main Conclusions

The Global Social Observatory is pleased to submit this final report for the project entitled “Consultation Process on Conflict of Interest in the SUN Movement”. The purpose of this two-year effort has been to develop a transparent process to address how to prevent and manage conflicts of interest in the SUN Movement and to improve mutual understanding and willingness of stakeholders to collaborate through multi-stakeholder mechanisms for delivering better nutritional outcomes for mothers and children. Five main conclusions are presented here in summary form. They are more fully developed in the main body of this report.

- The GSO has delivered a *Reference Note and Toolkit on Engaging in the SUN Movement: Preventing and Managing Conflicts of Interest*; and a *Synthesis Report on Key Messages and Lessons Learned* that can help to lay the foundations for developing and strengthening SUN multi-stakeholder platforms at the country level.
- The project has reinforced the importance of addressing conflict of interest issues at the country level and thereby focusing on capacity-building at this level. This will necessarily result in national variations in applying the policy framework and tools to the national platforms – and also within stakeholder groups at the country level.
- Trust-building among *all* participating stakeholders is a necessary contributor to successful multi-stakeholder collaboration. The policy framework offered in the *Reference Note* sets the stage for identifying the positive interests that are needed for building trust and defining the parameters for collaboration.
- Platform development is at an early stage in most SUN member countries, and capacity-building is needed for building multi-stakeholder alignment generally. Integrating the GSO-produced tools for the prevention and management of conflict of interest into a comprehensive strategy for multi-stakeholder alignment can contribute significantly to the building of trust and to the development of active multi-stakeholder platforms.
- There is a fundamental inconsistency between the SUN Principles of Engagement and the varied national approaches to implementing the International Code of Marketing of Breast-milk Substitutes. Consistent, authoritative guidance is needed from “those with the mandates at the global level”. In the interim, the SUN Lead Group should identify what it can do to facilitate the harmonization of approaches with both the Code and the SUN Principles of Engagement.



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The Project Goal

The Global Social Observatory was pleased to receive a grant from the Bill and Melinda Gates Foundation for a project entitled “Consultation Process on Conflict of Interest in the SUN Movement”. The purpose of the project was to develop a transparent process to address potential conflicts of interest and to handle actual claims of conflict of interest within the SUN Movement in order to ensure all stakeholders can contribute fully to achieving the Movement’s objective of delivering better nutritional outcomes for mothers and children. The goal was to facilitate comprehensive multi-stakeholder engagement by improving mutual understanding and willingness to collaborate through multi-stakeholder mechanisms to address under-nutrition and malnutrition among mothers and children.

The GSO has worked with the SUN Movement Secretariat and a Steering Committee drawn from the SUN networks and country focal points from April 2013 to March 2015 to develop a transparent process and to facilitate comprehensive multi-stakeholder engagement. This purpose and this goal have been fulfilled through action and outcomes tied to six objectives as described below. The report continues with a review of major accomplishments, lessons learned, challenges that need to be addressed, and available assets. A concluding section of the report offers some proposed next steps.

Objectives and Desired Results

Six objectives and desired results were identified for the overall project goal. They were described and implemented as follows:

1. Reaching a common understanding of what “participating in the movement” means in practice, in particular through an elaboration of the SUN Movement Principles of Engagement;

The common understanding of what “participating in the movement” means in practice was established through a consensus among participants in the consultation process on the seven SUN Principles of Engagement and on the addition of three principles specifically directed to preventing and managing conflicts of interest. The three additional principles are to “act with integrity and in an ethical manner that enhances the reputation and impact of the SUN Movement; be mutually respectful and seek to earn the trust of those whom you are working; and do not harm”.

In addition, a research paper mapping existing law and practice on conflict of interest was completed as a useful preparation for the consultations, with an executive summary distributed to participants in the first consultation session on 13 June 2013. The bibliography from this research paper was integrated into the subsequent Toolkit in March 2014 and updated in the revised Toolkit in January 2015.

2. Reaching an agreed definition of ‘Conflict of Interest’ in the context of the SUN Movement;

An agreed working definition of “Conflict of Interest” in the context of the SUN Movement was developed in the consultation phase, tested and reaffirmed in the enhanced learning exercises, and retained as developed in the final documents. Particular attention was the development of separate definitions for individual and organizational conflicts of interest, but the same language was used for





each. The basic thrust of the definition is that the pursuit of either personal or organizational interests at the expense of supporting the country's nutrition-related goals is understood to be a conflict of interest. The actual definitions for each, i.e. for individual and for organizational conflict of interest, refer to the effect of "compromising, interfering with or taking precedence over the objectives of *the joint endeavour*". Concerns have been raised about the possibility that the objectives of a joint endeavour could be interpreted to weaken a country's nutrition-related goals, but participants confirmed that government leadership of the SUN country-level platform means that the joint endeavour is the same as the country's nutrition-related goals. Some consideration was also given to developing a more detailed definition, such as identifying certain kinds of *potential* conflicts of interest in the definition (e.g. the manufacturing and promotional marketing of infant formula products). The consensus was reached to stay with the more general umbrella definition(s) and to use other parts of the policy framework on identification and management of conflicts of interest to address these concerns.

3. Developing a SUN Movement guidance note on conflict of interest;

Three consultations (13 June, 23 July and 16 October 2013) were conducted in Geneva, with advice and support of the project Steering Committee. Participants were drawn from the SUN global networks and from the field. Outcomes in the form of meeting reports were prepared for use in the development of the guidance documents and circulated to participants.

Based on inputs from the consultation process, the GSO prepared a SUN Movement guidance note on conflict of interest that was renamed as the *Reference Note on Preventing and Managing Conflict of Interest in the SUN Movement*. This included commentary on how all ten SUN Principles of Engagement (seven original principles and three added by participants in the consultation process) apply to the prevention and management of conflict of interest; the definitions of conflict of interest in the context of the SUN Movement; a summation of the existing international and national laws and policies applicable to conflict of interest in the SUN Movement; and a policy framework with four elements for preventing, identifying, managing and monitoring conflicts of interest and with underlying provisions on capacity building.

At the request of the Steering Committee, the GSO prepared an *Executive Summary* as a separate document to be used for promotional purposes. In addition, at the third consultation session in October 2013, it was agreed to prepare a *Toolkit* to supplement the *Reference Note*. The Reference Note and Executive Summary were submitted to a legal review in January 2014; the Toolkit was completed in January 2014; and the package of three documents was submitted to a second legal review in February 2014. The Steering Committee subsequently responded to the recommendations from these reviews and approved a revised version of all three documents by mid-March 2014. All three documents were translated from English into French and Spanish, and printed in the three languages.

4. Testing the usefulness of the guidance framework in four specific enhanced learning exercises;

In the next phase of the project, four "enhanced learning exercises" were conducted in partnership with the SUN Movement Secretariat and with the support of SUN country focal points and local planning committees in Ghana (1-2 April 2014), Kenya (29-30 May 2014), El Salvador (17-18 July) and Indonesia (3-4 December 2014). Participants came from the host country as well as selected neighboring countries for a total of 15 SUN Movement countries. Local case study authors prepared





the hypothetical but locally applicable case studies that served as the basis for applying the material in the *Reference Note and Toolkit*. Meeting reports were prepared by GSO for each ELE. Lessons learned from each ELE were applied to the remaining ELEs. All case studies and meeting reports are available only in English, except for the El Salvador meeting report and case studies which are available in English and Spanish, and the Indonesian case studies which were originally prepared in Indonesian.

5. Developing and integrating a community of practice on ethics and conflict of interest through the enhanced learning exercises;

Conflict of interest must be seen as an ethical issue. For that reason, a global expert on ethics and conflict of interest joined the project for the ELE phase of the project and assisted with the recruitment of a local expert on ethics for each of the four ELEs. The local experts made presentations on the local ethics perspective on conflict of interest, participated in the ELE learning circles and submitted their own meeting reports. These local reports were consolidated by the global expert into a final report on ethics in the area of conflict of interest for the SUN Movement.

6. Integrating the lessons learned from the project into a revised guidance framework, a synthesis note, and an ethics report for the consideration of next steps at a concluding global conference.

A revised Reference Note and Toolkit and a Synthesis Report of the outcomes of the four enhanced learning exercises were prepared in English, translated into French and Spanish and printed for distribution to the participants of the final Global Conference. The concluding Global Conference was held on 16 to 17 February 2015 in Geneva, Switzerland. The intended outcomes were to promote an enhanced understanding of the relationship between the policy framework and tools and their application to past and future experiences at community, country or regional levels, to make recommendations for integrating the policy framework into the emerging community of practice on multi-stakeholder engagement and alignment and to make recommendations for the GSO report to the SUN leadership on prevention and management of conflict of interest for SUN countries.

Participants shared their own perspectives and lessons learned on the issues, interacted with panels on country perspectives, on SUN network perspectives and on multi-stakeholder experiences outside of the SUN Movement. Breakout sessions were held to propose next steps at the country and global levels, and a final open-ended session reviewed the 12 key messages and lessons learned from the Synthesis Report. A comprehensive Global Conference meeting report was also shared with all participants. The final meeting report is only in English.

Accomplishments

The GSO has identified a number of accomplishments oriented to fulfilling the purpose of developing a transparent process on how to address conflict of interest in the SUN Movement and facilitating multi-stakeholder engagement to improve mutual understanding and a willingness to collaborate. These are listed here:

- Acceptance of the revised Reference Note and Toolkit as useful instruments for going forward at the country level.





- Enhanced understanding of the difference between conflict and conflict of interest and the importance of capacity building at the local level to strengthen the understanding of this fundamental point.
- Instilling a demand for country-level workshops to assist with awareness raising and trust-building in support of developing COI policies to facilitate the building of multi-stakeholder platforms through multi-stakeholder alignment of interests, roles and responsibilities.
- Enhanced understanding of the complexities of involving different sectors, whether civil society or private sector, and shared understanding of possible solutions and best practices to deal with this issue. This includes such initiatives as drafting different TORs for different stakeholders and interests while also applying a uniform policy on COI; using a neutral facilitator to establish common objectives among stakeholders with conflicting interests; and establishing transparent channels for distribution of resources among civil society groups.
- Enhanced awareness of the divergent practices regarding the implementation of the International Code of Marketing of Breast-milk Substitutes and the need to promote a common SUN Movement policy.

Lessons Learned

In general, twelve key messages and lessons learned are featured in the Synthesis Report and were reaffirmed and further elaborated upon by participants at the concluding Global Conference. Certain refinements on these key messages and lessons learned merit particular mention here.

1. The **SUN Principles of Engagement** form an ethical framework for the prevention and management of conflicts of interest within the context of the SUN Movement and can be seen as a base from which individual national policy frameworks can be developed. The Principles can be seen as an important anchor for the Movement's work on conflict of interest at both global and country level.

Additional observations: The inclusion of local ethics experts in the four Enhanced Learning Exercises has contributed to enhanced awareness among stakeholders that the SUN Principles do form an ethical framework for the SUN Movement. At the concluding Global Conference, the global ethics expert presented a coordinated Ethics Report with contributions from the four local experts, and three of the four local experts were also present at this concluding Conference. The Ethics Report identifies ways in which the SUN Principles can be better understood. The GSO agrees that it would be appropriate to consider a more comprehensive review and analysis by the SUN Movement of how to apply each of the SUN Principles to COI situations, to build on the work that is already reflected in the *Reference Note*.

2. **Leadership at all levels** is a pre-requisite for the successful prevention and management of conflict of interest. Leadership needs to be transparent and inclusive, oriented to consensus building among the diverse stakeholders but willing to address conflicts of interest consistently, effectively and in a timely manner.





Additional observations: Government leadership is key for establishing and maintaining multi-stakeholder platforms. Participants at the Global Conference did identify the challenge of having leadership that is respected by all stakeholders, including the different ministries of government and that such leadership should ideally come from a neutral forum. Similarly, each of the local stakeholder networks should work out their leadership and structure, while coordination of leadership responsibilities among these stakeholder groups should be part of the government's leadership role.

3. **Written policies** consistently applied and monitored are essential. The emphasis should be on a policy framework that prevents conflicts of interest from arising but managing them effectively when they do arise. Where possible, policies should be developed in advance as part of the broader terms of reference for the multi-stakeholder platform. Leaders within government or elsewhere should undertake wide consultation and continuous communication to ensure a clear understanding of the policies in place.

Additional observations: Having a written policy in place to address conflicts of interest includes the recognition that there needs to be a minimum set of uniform rules on conflict of interest applicable for all stakeholders but also a recognition that the different interests and roles of each stakeholder need to be specifically articulated. Each stakeholder brings different interests and roles, and these can influence the understanding of what types of potential conflicts of interest may need to be addressed for which types of stakeholders.

4. The Reference Note and Toolkit present a framework on prevention, identification, management and monitoring of conflict of interest, but it is understood that **the mechanisms for addressing issues of conflict of interest will differ from country to country**. They will reflect national contexts and be based in national legal and administrative structures and regulations. While the SUN Principles of Engagement and the GSO-SUN Reference Note and Toolkit can help guide governments, leadership must come from the national level to determine the appropriate mechanisms.

Additional observations: Applying the Reference Note and Toolkit to the immediate country setting requires local capacity-building, integrating policies into existing structures and regulations, and translation of materials into local languages. National workshops are recommended. Training materials should incorporate guidance on the tools for preparing a COI policy, disclosure forms and practices, identifying agreed categories of potential COI, applying risk-based approaches to identifying COI, applying due diligence, developing appropriate remedies, and systems for monitoring and evaluation. Case studies were not included in the original Reference Note and Toolkit, but a library of case studies should be developed for illustrative purposes on how different applications of COI policies are being implemented.

5. A **community-level focus** for strengthening nutrition practices presents a challenge in terms of communicating with community leaders and with the mothers and children to build the trust that is needed for multi-stakeholder collaboration. Priority needs to be directed to engaging in regular and clear communication for the practical implementation of preventing and managing conflict of interest at the community level.

Additional observations: The gender perspective of the objective needs to be highlighted, along with the empowerment of communities. Stakeholder groups should include groups representing the interests of the mothers and children and not just groups that are delivering the products and services to them.





6. **Decentralization** of responsibility for implementation presents another challenge in terms of the consistent application of conflict of interest policies. Equally, **regional discrepancies** can undermine more robust national approaches, and regional approaches, supported by regional organizations, could help strengthen national responses.

Additional observations: The challenge is both one of promoting what a consistent and coherent policy means as well as a challenge of monitoring the consistent application of that policy. This has raised the concern of adequate resources for monitoring and evaluation of the policy.

7. Determining how to manage the **role of the private sector** within multi-stakeholder processes remains a particular challenge for countries and other stakeholders. Putting in place robust mechanisms to prevent and manage conflicts of interest can play an important role in building trust among all participants.

Additional observations: The challenge of finding a suitable role for the private sector was a dominant theme throughout the project. Responding to this challenge involves more than having a robust COI policy in place. More efforts are being directed to identifying which parts of the private sector to include in SUN business networks at the country level and on defining the parameters for collaboration. A national business network may include large multinational enterprises, large national enterprises, small and medium enterprises and multiple different business sectors. This requires continuing and specific attention and encouragement. Some of the work done by the SUN Civil Society Network on understanding different types of civil society actors can contribute some good practices on how to proceed here.

8. **All stakeholder groups** within the Movement who are engaging in national multi-stakeholder platforms (or global partnerships) **have the potential for conflict of interest**. The Reference Note and Toolkit propose a policy framework that can be adapted to all stakeholders at the national level. All stakeholder groups, at all levels, should also recognize this potential and take appropriate measures to prevent conflicts from arising and to rapidly address them when they do.

Additional observations: Building trust is essential for multi-stakeholder collaboration, but disclosure of interests can be difficult to implement. Sometimes people are afraid to declare their interests, and other times there are hidden networks and traditional ways of doing things that are difficult to change. Power imbalances and stakeholders saying one thing and doing another were also raised. The Conference did include examples from other settings that can serve as a guide for addressing these kinds of challenges, but it was clear from the discussions that no one had yet implemented a functioning disclosure of interests policy applicable to the SUN Movement at country level. At the global level, the SUN Civil Society Network has adopted a disclosure policy and the SUN Business Network has a declaration of interests requirement. Both donors and UN agencies have existing codes and disclosure rules within their respective agencies and in specific Memoranda of Understanding with other partners. The role of a neutral facilitator to bring diverse interest groups together was mentioned in several instances.

9. The success of COI policies relies on **the availability of expertise, capacity and resources**. At present gaps exist in the human, financial and technical capacity of national governments to consistently implement and monitor policies, particularly at the sub-national level. Civil society





has an important role to play in supporting governments in this regard. Skills development was also emphasized for understanding and applying the proposed approaches and tools to practical situations.

Additional observations: Participants at the Global Conference were interested in monitoring and evaluation and reaffirmed the merits of addressing this with support from civil society. They also recommended the development of online resources for information sharing and inclusion of reporting at global gatherings or forums. More broadly, the interest in convening national workshops on COI reflected this interest in local capacity-building as well. Mentors and champions were also mentioned, and it is conceivable that this could also build into a community of practice on the ethical dimensions of preventing and managing COI.

10. **National and local academic institutions** can contribute to capacity building at the national and local levels by developing country-specific curricula and case studies and to undertake relevant research on conflict of interest. Research should provide an evidence base for policy development and targeted capacity building.

Additional observations: Local capacity for addressing actual conflicts of interest and handling actual conflicts of interest may require practical skills development, but it should be based on a strong academic appreciation for the distinction between conflict and conflict of interest, as well as the distinction between interests and conflicts of interest. It was informative to learn from the ELEs that many participants had not been aware of such distinctions beforehand and that the concept of conflict of interest was itself a new concept. One might suggest that the concepts are new but the practice of governance in any setting has some recognition of the ways in which different kinds of stakeholders find ways to collaborate on a common goal. National and local academic institutions can help to develop a national and local knowledge base of conflict management systems and applying the basic concept of the distinction between conflict and conflict of interest.

11. The **International Code of Marketing of Breast-milk Substitutes** is recognized as a key international standard for infant and young child feeding to which all members of the Movement should adhere. Nonetheless, application remains a challenge for those involved in managing issues around conflict of interest on a daily basis. Differences exist in national legislation, which can lead to different applications across borders. In addition, messages received from different actors within the international community are sometimes inconsistent. Those with the mandates at the global level have an important role in supporting countries in their implementation of the Code by providing consistent and authoritative guidance.

Additional observations: The International Code of Marketing of Breast-milk Substitutes was of particular concern to the participants. Guidance is sought on establishing consistent compliance with the Code as a central tenet for the SUN Movement in all country settings. This is an urgent matter.

12. **Distinguishing between ‘conflicts’** or ‘divergent interests’, for instance between stakeholders’ ideological or political views, **and ‘conflict of interest’** remains a challenge for many in the Movement. Disagreeing with, or disapproving of, the approach or activities of another stakeholder does not necessarily mean that they have a conflict of interest unless those activities are undermining the common effort. All those involved in the Movement should be cognizant of these differences.





Additional observations: For the GSO, this has become the most important lesson learned from the project. Stakeholder alignments don't happen automatically when different stakeholders who should be collaborating with each other on nutritional improvements for mothers and children have a history of not collaborating with each other in other settings. The GSO came to recognize this significance of this message in the course of the ELEs and included a special preliminary session on distinguishing between conflict and conflict of interest at the fourth and final ELE. The SUN Coordinator ad interim Tom Arnold put this very succinctly when he described conflict as something that can be negotiated while conflict of interest is not open to negotiation. But this does mean including a primer on the differences between the two as an integral part of building a policy framework on COI.

Challenges

The GSO features both anticipated and unanticipated challenges in this section of the report – the challenge of determining rules of engagement applicable to stakeholders who are involved in nutrition issues but are not involved in the SUN Movement; and the challenge of adapting a policy framework for conflict of interest where a multi-stakeholder platform is not yet well established. These challenges are described here, along with the GSO approach to addressing the challenge.

The first challenge pertained to the presence of stakeholders who are not part of the SUN Movement but who have an interest in under-nutrition. They are both NGO critics of multi-stakeholder engagement with the private sector but especially infant formula manufacturers, on the one hand; and business enterprises, mostly large multinationals but also others involved in the production of infant formula, on the other hand. The GSO reaffirmed its own policy of inclusiveness and encouraged the participants within the SUN Movement to articulate their own concept of inclusiveness.

Violators of the International Code of Marketing of Breast-milk Substitutes were not participants in any of the GSO consultation events or enhanced learning exercises, but there were participants who described different approaches to handling their relationships with infant food manufacturers. On one occasion, an NGO critic of the SUN Movement's multi-stakeholder approach participated in a GSO enhanced learning exercise, but the other participants articulated their overwhelming support for the SUN Movement's approach. At the global conference, participants encouraged the development of clear guidance on how to address the BMS Code and the fact that it has not been fully implemented in many SUN countries. This may not resolve the ideological division between the critics of the infant formula industry (who also include many who are opposed to engagement of anyone from the private sector) and the infant formula industry itself (where compliance with the Code in developing countries is muddled by their non-compliance in developed countries and their determination to continue marketing their infant formula products wherever there is a market).

The other challenge had to do with a change in the focus of the project. At the start of the project, it was agreed that the guidance note would be developed primarily for use in addressing COI issues "not dealt with at the national level or arising at global level", with a presumption that multi-stakeholder country-level platforms already existed or were coming together, and that they needed an external channel for referral of COI issues. This plan was modified early in the consultation phase to focus on developing a policy framework for the prevention and management of conflict of interest that could assist governments in the management of their country-level platforms at the country level, rather than a policy framework for an external or global mechanism. In the ELE phase of the project, then, the focus had to be on how to integrate a COI policy framework into a multi-stakeholder platform – or into a "pre-platform" phase for bringing stakeholder groups together. The shift in focus proved to





be useful for emphasizing the importance of preventing COI from becoming an issue and for putting a written COI policy in place at the start of the platform-building process as part of that prevention strategy.

Trust building is a preliminary precondition for establishing collaboration among diverse stakeholders, and a policy framework for the prevention and management of conflict of interest can contribute to this by having such a policy in place as part of the trust-building process. The *Reference Note* recommends that all stakeholders should be subjected to the same rules regarding conflicts of interest, that all stakeholders should be expected to disclose their interests and that the leadership should have procedures in place to accommodate and manage their different interests.

This does suggest that a COI policy should be integrated into the broader community of practice on multi-stakeholder alignment. That is to say, although the same COI rules should apply to all stakeholders, the very nature of multi-stakeholder engagement is based on the value of different stakeholders with different interests coming together as pieces of a puzzle, each one different but each one needed for completing the overall puzzle.

The GSO supports the integration of the key messages and lessons learned, and the basic policy framework from the *Reference Note* and *Toolkit* into the evolving community of practice on multi-stakeholder alignment. Because many countries are still in a platform-building phase, the capacity-building process for a COI policy needs to start with a basic introduction on distinguishing between conflict and conflict of interest. The *Toolkit* can be applied to assist this learning process, with its options for disclosure of interests, risk assessments, due diligence methods, remedial measures and monitoring systems.

Sustainability and Next Steps

The enthusiasm among participants from the 15 countries in the ELEs and others in the Global Conference for adapting the ideas from the *Reference Note* and *Toolkit* into their stakeholder and platform development should be followed up with:

- Support for national workshops, including the translation of documents into local/national languages, and other capacity-building activities at the national or local levels.
- Integrating the *Reference Note* and *Toolkit* into an emerging community of practice on multi-stakeholder alignment. Multi-stakeholder alignment needs to be more fully understood and developed, with the policy framework for prevention, identification, management and monitoring of COI integrated into the alignment process.
- Aligning stakeholders within stakeholder groups is also in need of development. The GSO has facilitated such stakeholder alignments in other projects, and similar principles of transparency, inclusiveness and classification of interests and roles will need to be implemented as in the multi-stakeholder setting for COI.
- The availability of a neutral third party to facilitate trust-building and multi-stakeholder alignment is to be encouraged as an option for addressing COI issues.





- Multi-stakeholder collaboration may require attentiveness to COI policies between different networks as well as at the multi-stakeholder platform level.
- Additional stakeholder groups should be considered in the alignment process, including consumer groups, health professionals, academic groups (already present in some country platforms) and the media.
- Preparing an “in-practice brief” on what kinds of COI issues that participants in the SUN Movement have encountered and what they have done to address them. This should include a review of how other multi-stakeholder partnerships or platforms have addressed COI issues and what kinds of policies they have put into place. It should conclude with a review of how the *Reference Note* and *Toolkit* might be applied to develop a policy framework for COI.
- The accumulation of hypothetical case studies prepared by local authors in the four Enhanced Learning Exercises can serve as the beginning of a library of case studies. There should also be a review of where other case studies and scenarios should and can be developed.
- Capacity-building should be oriented to training materials on specific aspects of the *Reference Note* and *Toolkit*. The *Toolkit* has been strengthened with user-friendly materials that can be adapted for specific training materials, such as:
 - Putting disclosure forms into practice
 - Coping with power imbalances among stakeholders
 - Applying a risk-based approach to potential COI
 - Understanding what due diligence means
 - Criteria for applying different levels of remedial actions
 - Cost-effective monitoring tools
- An in-depth review of how the SUN Principles of Engagement are applicable to providing the ethical foundation for a policy framework on COI should be encouraged.
- Mentors or champions can help stimulate good COI policy development, and these could include the local ethics experts and others with an ethical perspective to provide guidance.
- Global forums and online resources should be developed to support success stories, information exchanges and learning routes on COI and its integral role in multi-stakeholder alignment.
- The International Code of Marketing of Breast-milk Substitutes triggers strong emotions, and an interim policy should be developed pending any strengthening of the international standard by those with the global mandates.

As an independent, neutral and impartial forum for multi-stakeholder dialogue, the GSO has welcomed the opportunity to work with participants in the SUN Movement to facilitate the building of trust for the effective prevention, identification, management and monitoring of conflict of interest in the SUN Movement. As an independent, impartial and neutral facilitator of multi-stakeholder dialogue, the GSO will continue to support the complex interactions required for effective platform development, multi-stakeholder alignment, policy formulation, and capacity building for the basic prevention, identification, management and monitoring conflict of interest.





Project Documents

In addition to the original and updated Reference Note and Toolkit, the Synthesis Report, the preliminary research report and executive summary and all meeting reports from the consultation sessions, the enhanced learning exercises and the global conference have been posted on the GSO website (www.gsogeneva.ch). Many of them are also posted on the SUN Movement website. Here is a list major project documents with links to the GSO website.

Preliminary Exercises

Project Background – BG1- April 2013
GSO Statement of Principles -18 Sept 2012
Scoping Exercise – June 2013
Executive Summary of Scoping Exercise – June 2013

Phase I Consultations

First Consultation Summary Report – 13 June 2013
Second Consultation Agenda – 25 July 2013
Revised Second Consultation Summary Report – 25 July 2013
Progress Report for SUN Lead Group – 20 Sept 2013
Third Consultation Summary Report – 16 Oct 2013

Phase I Outcomes – The Reference Note and Toolkit

Engaging in the SUN Movement: Preventing and Managing Conflicts of Interest – Executive Summary – March 2014
Engaging in the SUN Movement: Preventing and Managing Conflicts of Interest – Reference Note – March 2014
The SUN Movement Toolkit for Preventing and Managing Conflicts of Interest – March 2014

First legal review report – 17 January 2014
Second legal review report- 6 March 2014
Follow up questions and responses on second legal review – 4 April 2014

Enhanced Learning Exercises

Ghana (1 to 2 April 2014)

Ethics report on the conclusion drawn from Ghana Enhanced Learning Exercise – 4 April 2014
Report on Ghana Enhanced Learning Exercise – 28 April 2014

Kenya (29 to 30 May 2014)

ELE Summary report Kenya – 16 June 2014





El Salvador (17 to 18 July 2014)

ELE meeting report El Salvador – July 2014

Ethics report for El Salvador ELE – Aug 2014

Indonesia (3 to 4 December 2014)

ELE meeting report – Indonesia – Dec 2014

Final Reports

Synthesis Report - Feb 2015

Global Ethics Report – Feb 2015

Final Executive Summary, Reference Note and Toolkit (English, French and Spanish) – Jan 2015

Global Conference Report – March 2015

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