



College of  
Dietitians  
of Ontario

# Conflict of Interest and Dietetic Practice Guiding Principles

2016





# **Client-Centred Services**

## **Safe, Ethical and Competent**

# Contents

- Section 1: What is Conflict of Interest?
- Section 2: Importance to Dietetic Practice
- Section 3: Conflict of Interest Framework
- Section 4: Perceived Conflict of Interest
- Section 5: Quiz – Test Your Knowledge
- Section 6: Scenarios
- Section 7: Summary
- Section 8: Resources



## SECTION 1

# What is Conflict of Interest?



# Conflict of Interest (COI)

“In the mind of a reasonable person, an RD has a personal interest that could improperly influence their professional judgment.”

The RD considers their own or someone else's interests rather than the client's.

(Jurisprudence Handbook for Dietitians in Ontario, chapter 9: p. 101)

# Four Components of COI

1. Personal Interest

2. Professional Judgement

3. Improper Influence

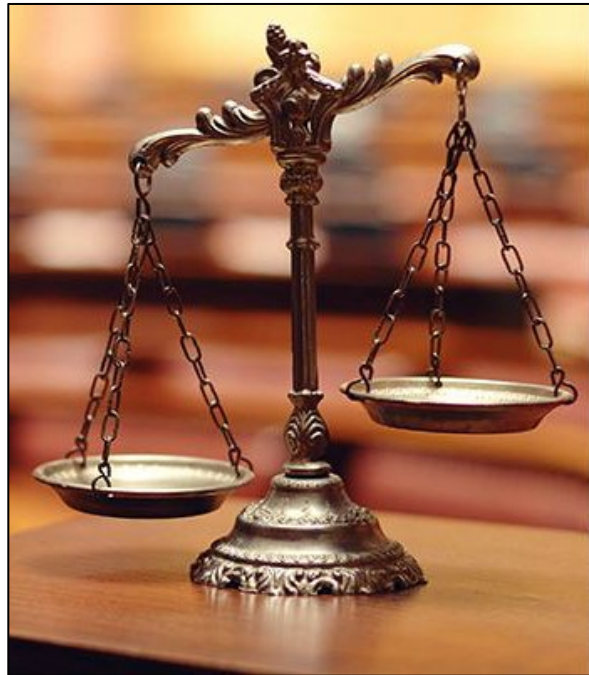
4. "Reasonable Person" Test

# 1. Personal Interest

**Money**

**Rebates/  
Discounts**

**Loans**



**Gifts**

**Preferential  
Treatment**

**Moral Stance**

**Direct or Indirect**

## 2. Professional Judgement

Personal Interest  
improperly influences  
professional judgment





### 3. Improper Influence

Holds *SWAY*

Depends on circumstances

RDs should be honest with themselves



## 4. "Reasonable Person" Test

The  
Nose  
Knows





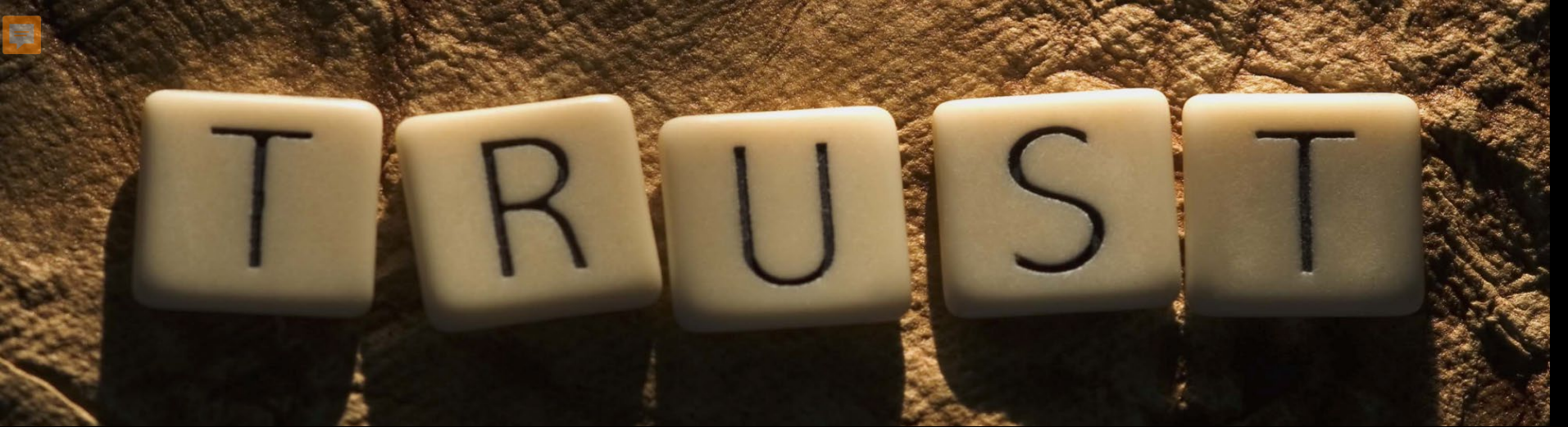
College of  
Dietitians  
of Ontario

## SECTION 2

**Why is recognizing a conflict of interest so important to dietetic practice?**

# Trust + Integrity + Ethics





# Reliance or belief in the RD's expertise



**Integrity is doing the right  
thing even when no one is  
watching.**

**-C.S. Lewis**

**Adherence to moral and ethical principles**



# Ethics

- Rules of conduct
- Standards of behaviour



Depends on context



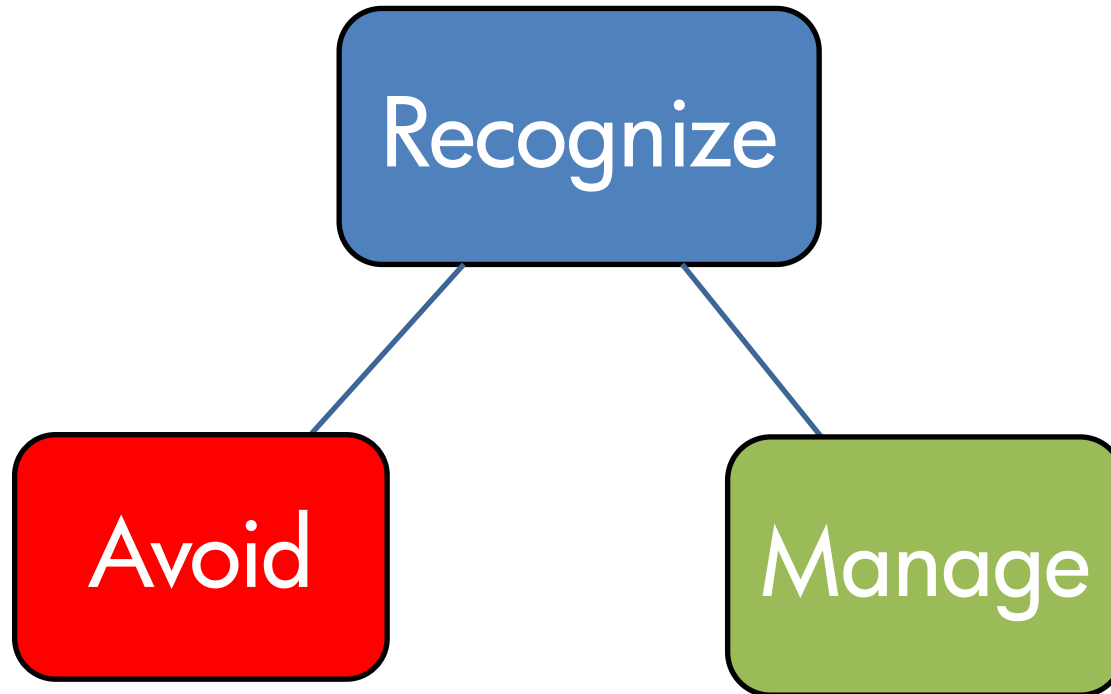
Always act in best interests of clients



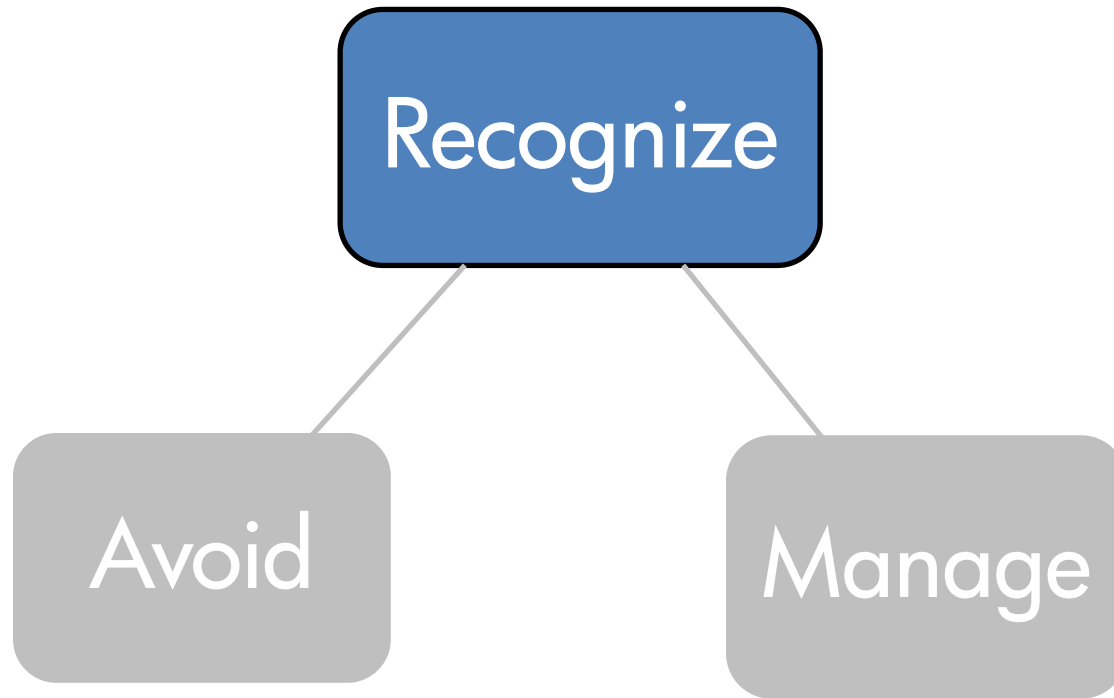


# SECTION 3

## Conflict of Interest Framework



# Conflict of Interest



# AM I IN A CONFLICT OF INTEREST?

Ask yourself:  
Is anyone relying on my professional judgment in this situation?

If NO, there should be no conflict of interest.

If YES, is anything competing with my professional duty to my clients?

If YES, is the competing consideration so significant that a reasonable person would say I am acting in my own interests above those of my clients?

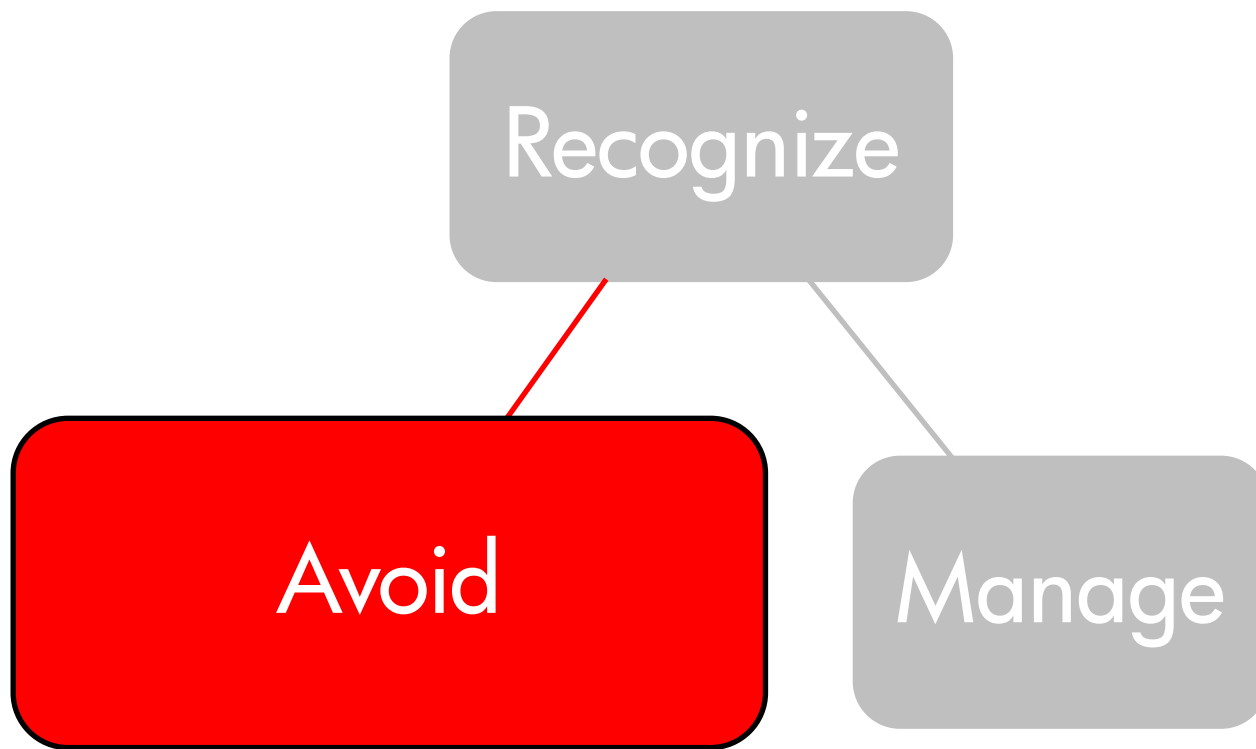
If NO, there should be no conflict of interest.

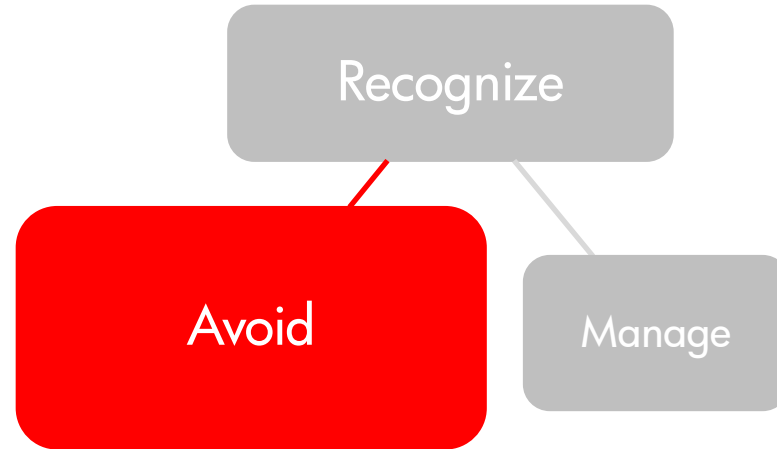
If YES, avoid the situation entirely.

If NO, what safeguards could be put in place to adequately address the concern?

# Who Benefits?

Benefit to Client	Benefit to RD	Conflict of Interest	
Yes	No	NO	✓
No	Yes	YES	X
Yes	Yes	MAYBE Danger Zone	





**Always Avoid  
Referrals for Profit**



Recognize

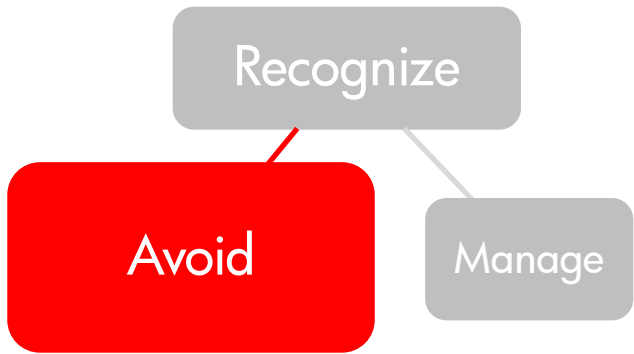
Manage

Avoid



**AVOID** accepting large benefits or gifts



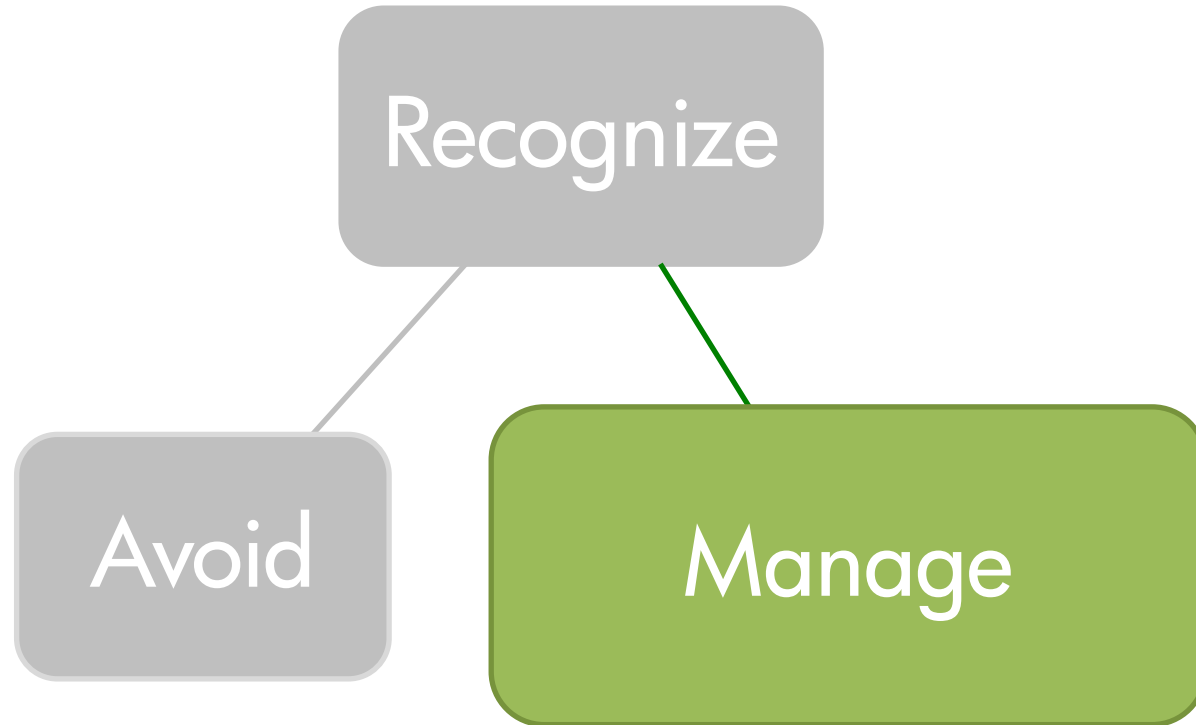


**AVOID**  
direct payment  
for supervising  
learners





# Conflict of Interest

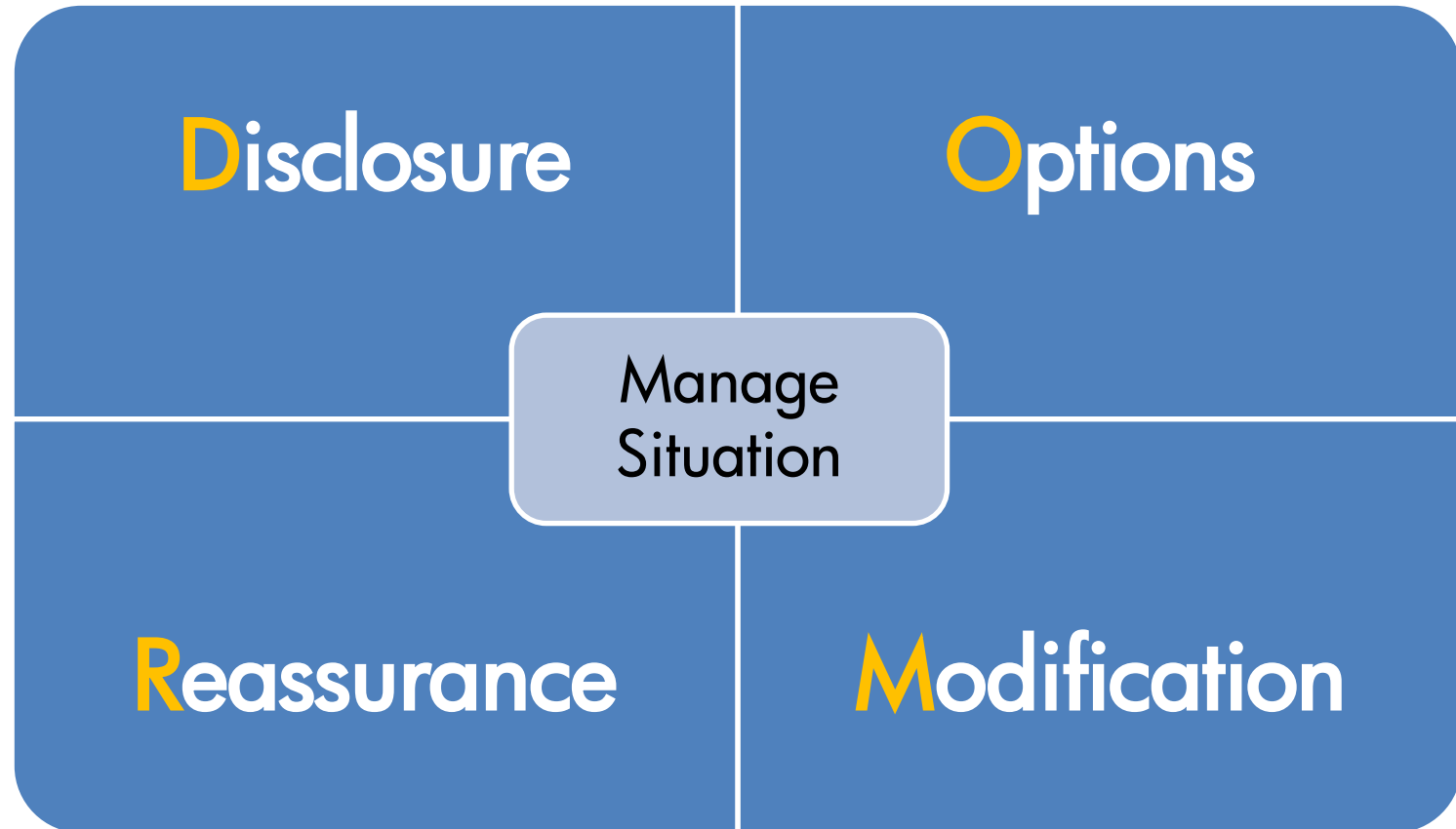


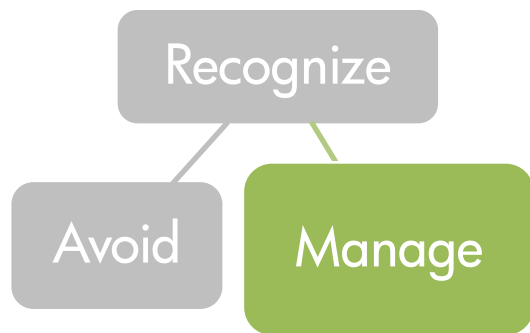


*Right Way*

*Wrong Way*

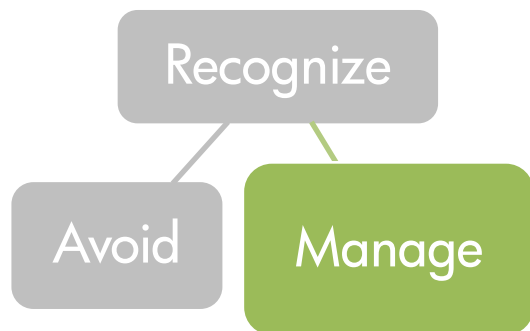
# DORM Principle





## Selling Products to Clients

An RD has worked extensively with a pharmaceutical company to develop a line of multivitamin supplements that he feels are superior to other products on the retail market. He sells his supplements directly to his clients in private practice and people can also purchase the products through his website.

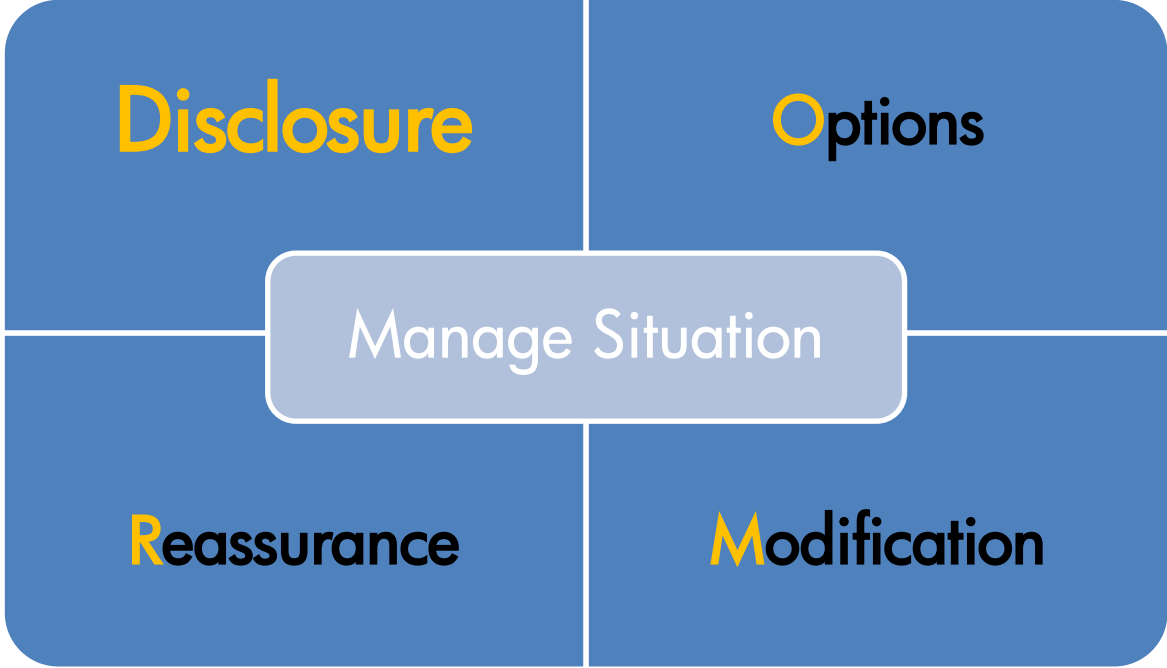


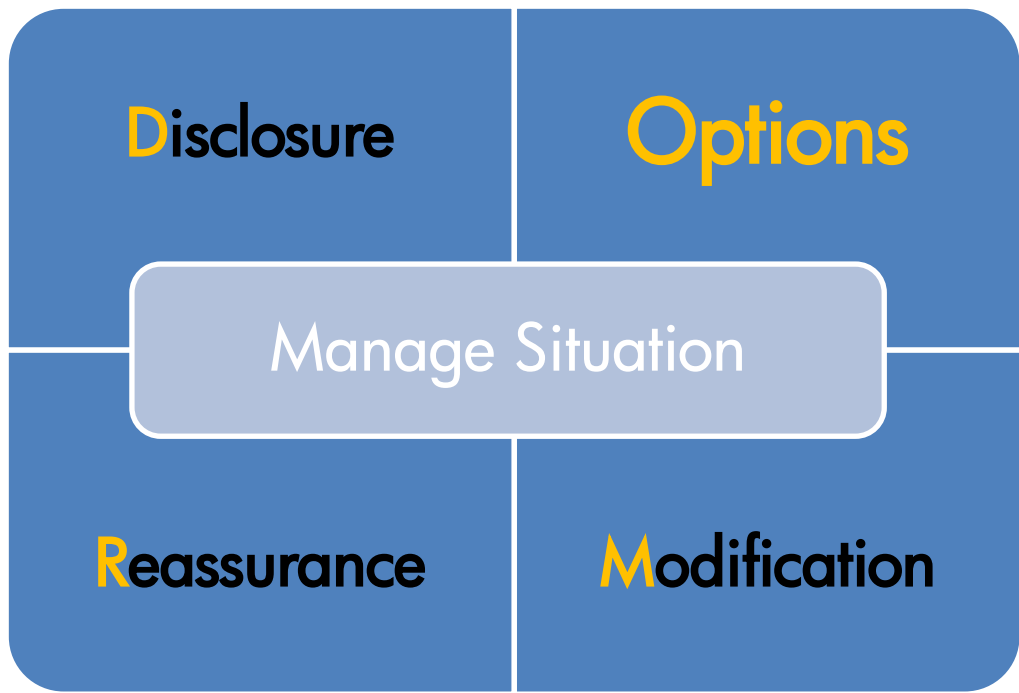
## Selling Products to Clients

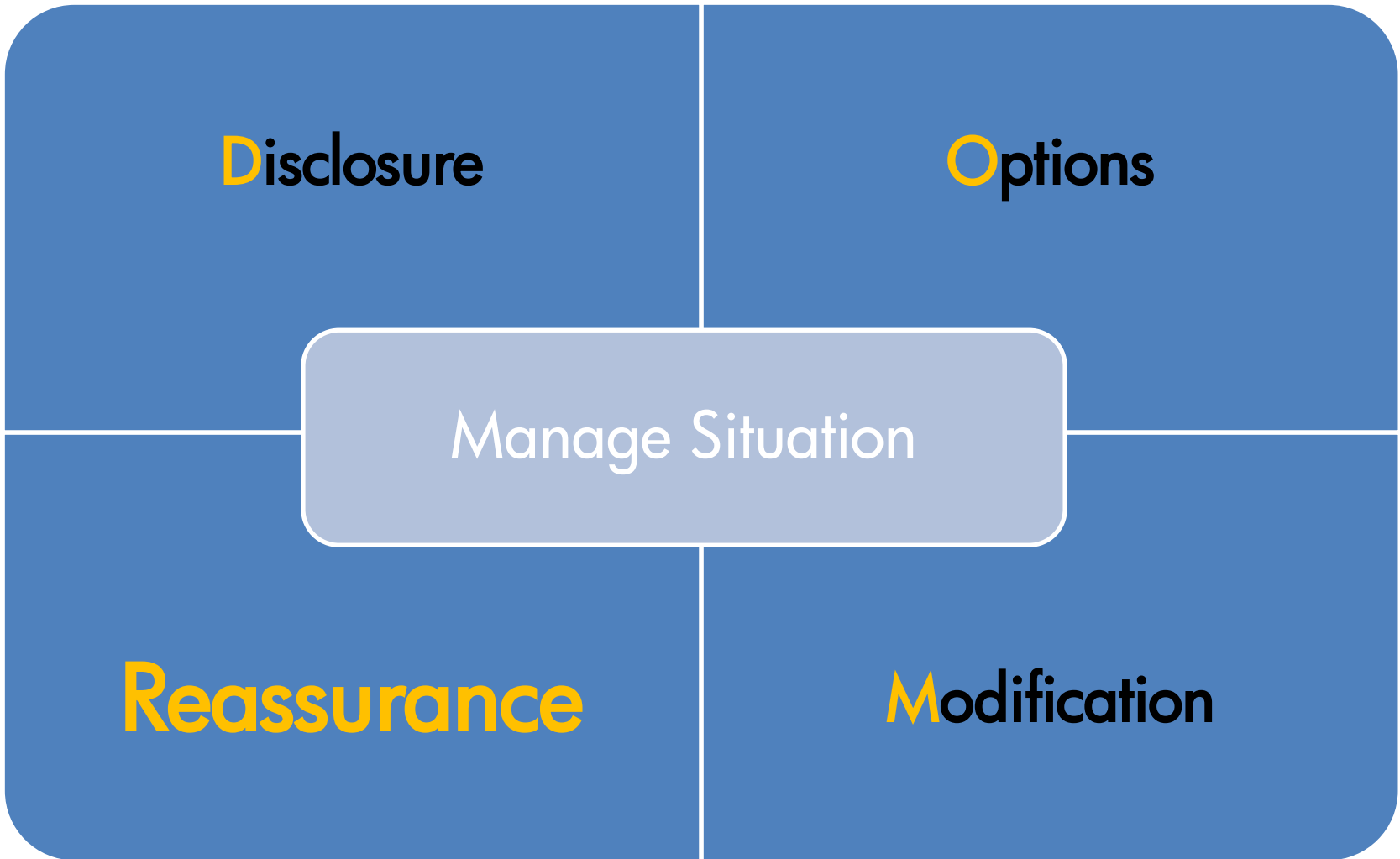
### What is the concern?

- The RD's professional judgment may be improperly influenced by financial gain.

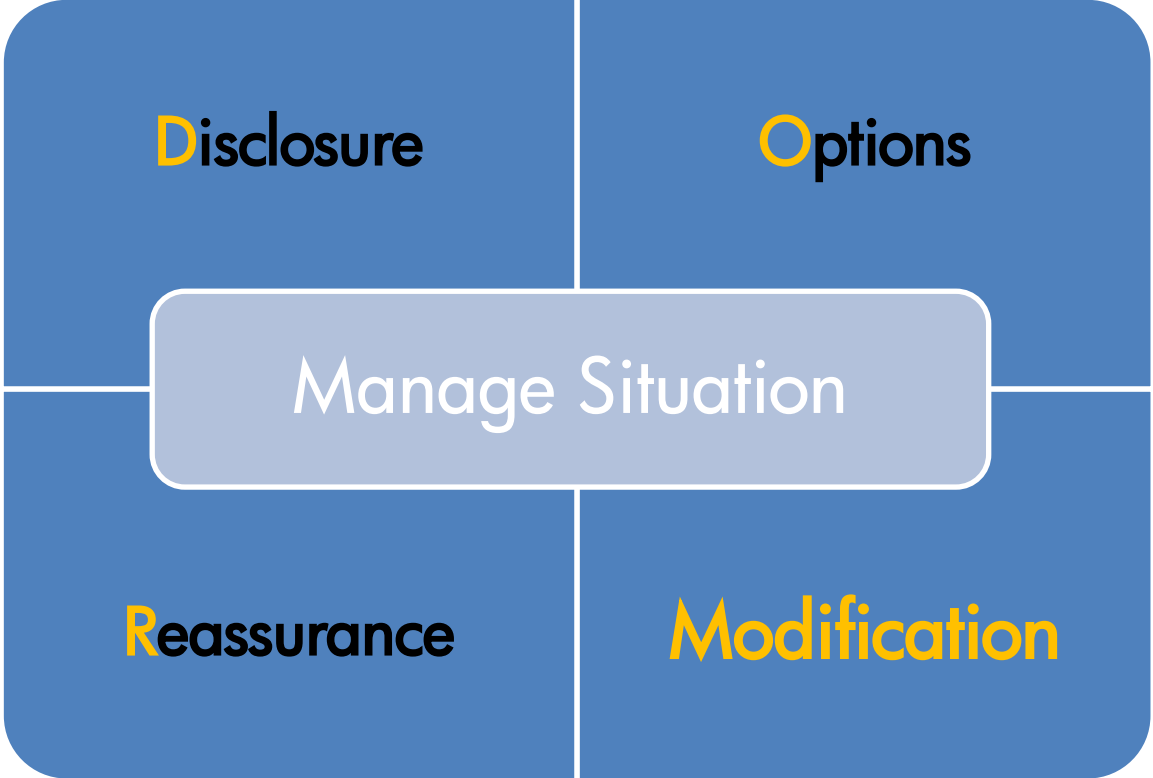
### How would you apply the DORM Principle?













# SECTION 4

## Perceived Conflict of Interest





A perceived conflict of interest  
is just as damaging  
as a real one.

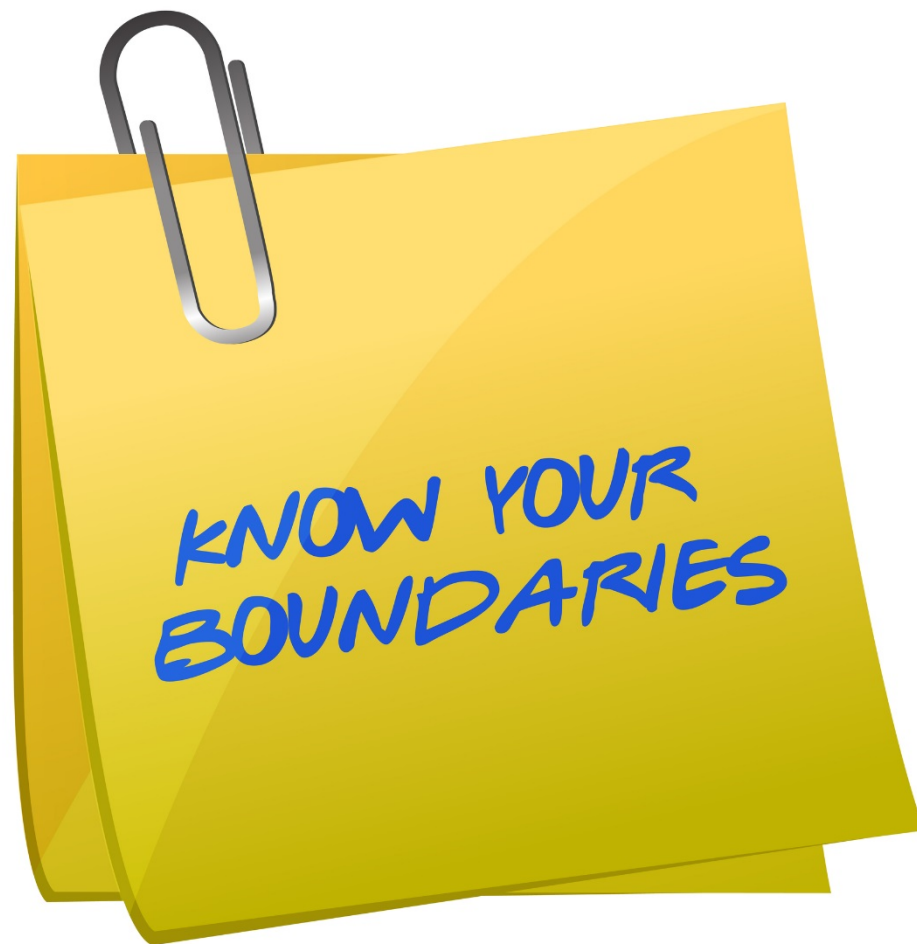


# Manage the Perception

- How would others see this?
- Be alive to the situation
- What safeguards or strategies could be put in place?
- Provide additional information

Preserve client-RD relationship

Boundary crossings can blur the lines of a professional relationship and compromise an RD's objectivity.





# Boundary Crossings

A boundary crossing has two risks:

1. Interferes with RD's professional judgment
2. Compromises ability of client to accept or refuse services or provide informed consent

**RDs must identify boundary crossings and take corrective actions**



# SECTION 5

## Quiz – Test Your Knowledge



# 1. What is conflict of interest?

- A) An RD has a personal interest that could improperly influence his/her professional judgment.
- B) The RD considers their own or someone else's interests rather than his/her client's.
- C) Conflict of interest is not a concern for RDs.
- D) Both A & B.

Correct - Click anywhere or  
press Control Y to continue

Incorrect - Click anywhere or  
press Control Y to continue

Your answer:

You did not answer this  
question completely

Submit

Clear





## 2. What are the four components of conflict of interest?

- A) Integrity, vulnerability, interest and profit.
- B) Personal interest, professional judgment, improper influence and reasonable person test.
- C) Honesty, influence, benefit and worth.
- D) Judgment, trust, ethics and performance.

Correct - Click anywhere or  
press Control Y to continue

Incorrect - Click anywhere or  
press Control Y to continue

Your answer:

You did not answer this  
question completely

Submit

Clear



### 3. Trust, integrity and ethics lay the foundation for dietetic practice.

- A) True
- B) False

Correct - Click anywhere or  
press Control Y to continue

Incorrect - Click anywhere or  
press Control Y to continue

Your answer:

You did not answer this  
question completely

Submit

Clear



## 4. Which of the following are clear-cut AVOID conflict of interest situations for RDs?

- A) Referrals for profit.
- B) Selling supplements to clients.
- C) Accepting larger benefits or gifts.
- D) Direct payment for supervising learners.
- E) A, C & D.

Correct - Click anywhere or  
press Control Y to continue

Incorrect - Click anywhere or  
press Control Y to continue

Your answer:

You did not answer this  
question completely

Submit

Clear



# 5. What does the DORM Principle stand for?

- A) Diffuse, Offer, Remedy, Manual.
- B) Differentiate, Only, Rectify, Manipulate.
- C) Disclosure, Options, Reassurance, Modification.
- D) Develop, Openly, Rituals, Movement.

Correct - Click anywhere or  
press Control Y to continue

Incorrect - Click anywhere or  
press Control Y to continue

Your answer:

You did not answer this  
question completely

Submit

Clear



# Quiz

<b>Your Score</b>	{score}
<b>Max Score</b>	{max-score}
<b>Number of Quiz Attempts</b>	{total-attempts}

Question Feedback/Review Information Will Appear Here

Continue

Review Quiz



# SECTION 6: SCENARIOS

1. Free product samples
2. Corporate sponsored messaging
3. Sponsored conference
4. Referring for profit
5. Receiving referrals
6. Referring clients to programs
7. Referring clients to private practice
8. Working for a food company
9. Receiving gifts
10. Recruiting clients for research
11. Selling products to clients
12. Lunch 'n learns
13. Payment for Supervising
14. Supervising Relatives



```
graph TD; Recognize[Recognize] --- Avoid[Avoid]; Recognize --- Manage[Manage];
```

Recognize

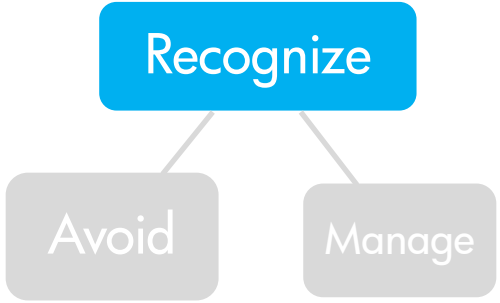
Avoid

Manage

## Scenario 1: Free Product Samples

An RD works in a family health team. She recently received some free product samples of shelf-stable milk and a stack of coupons for free products. Some of her clients would be interested in these products and coupons.

Can the RD distribute the product samples and coupons to her clients?



# Scenario 1: Assess the Situation Free Product Samples

Benefit to Client	Benefit to RD	Conflict of Interest
Yes	No	NO
No	Yes	YES
Yes	Yes	MAYBE







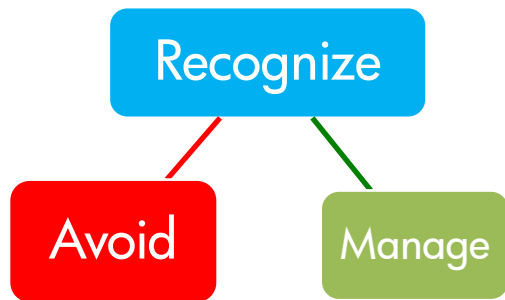
## POTENTIAL FOR PERCEIVED COI

## Scenario 1: TIPS Free Product Samples

---

### TIPS

- Give options to eliminate perceived conflict of interest, as applicable
- Communicate with colleagues



## Scenario 2: Corporate Sponsored Messaging

A vendor-sponsored event requires an RD to deliver messages that she is not entirely aligned with - although scientific, messages are somewhat skewed and highlight one food type and nutrient vs a whole diet or a variety of foods.

How should the RD handle this situation?

Recognize

Avoid

Manage

## Scenario 2: Assess the Situation Corporate Sponsored Messaging

### AM I IN A CONFLICT OF INTEREST?

Ask yourself:  
Is anyone relying on my professional judgment in this situation?

If NO, there should be no conflict of interest.

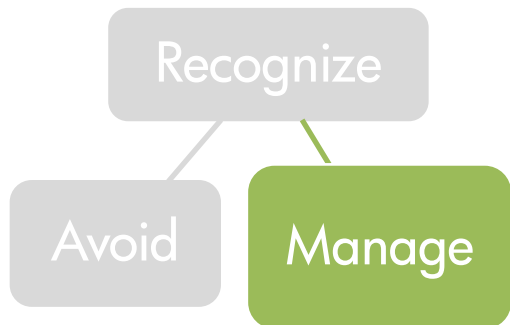
If YES, is anything competing with my professional duty to my clients?

If YES, is the competing consideration so significant that a reasonable person would say I am acting in my own interests above those of my clients?

If NO, there should be no conflict of interest.

If YES, avoid the situation entirely.

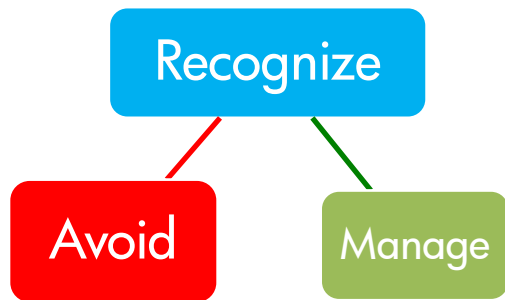
If NO, what safeguards could be put in place to adequately address the concern?



## Scenario 2: *MANAGE* Corporate Sponsored Messaging

### *MANAGE*

- Outline concerns to the employer or vendor
- Suggest alternative messages that present a balanced approach
- Provide options or alternatives, as appropriate
- If a compromise cannot be reached, the RD should decline



## Scenario 3: Sponsored Conference

You have been asked to speak at a conference and present a paper on a nutrition treatment of hyperlipidemia. After agreeing to speak, you receive the conference materials and learn that each session has a corporate sponsor. A large food company with a variety of retail products sponsors your session.

Should you speak at the conference?

Recognize

Avoid

Manage

## Scenario 3: Assess the Situation Sponsored Conference

### AM I IN A CONFLICT OF INTEREST?

Ask yourself:  
Is anyone relying on my professional judgment in this situation?

If NO, there should be no conflict of interest.

If YES, is anything competing with my professional duty to my clients?

If YES, is the competing consideration so significant that a reasonable person would say I am acting in my own interests above those of my clients?

If NO, there should be no conflict of interest.

If YES, avoid the situation entirely.

If NO, what safeguards could be put in place to adequately address the concern?

## POTENTIAL FOR PERCEIVED COI

## Scenario 3: TIPS Sponsored Conference

### TIPS

- Make a disclaimer before the presentation.
- Approach organizers regarding the session sponsorship



```
graph TD; Recognize[Recognize] --- Avoid[Avoid]; Recognize --- Manage[Manage];
```

Recognize

Avoid

Manage

## Scenario 4: Referring for Profit

An RD's friend is starting up a health care clinic. In order to drum-up business, the friend offers to pay the RD \$20 for each new client that the RD refers to the clinic.

Can the RD participate in this arrangement?



Recognize

Avoid

Manage

## Scenario 4: Assess the Situation Referring for Profit

### AM I IN A CONFLICT OF INTEREST?

Ask yourself:  
Is anyone relying on my professional judgment in this situation?

If NO, there should be no conflict of interest.

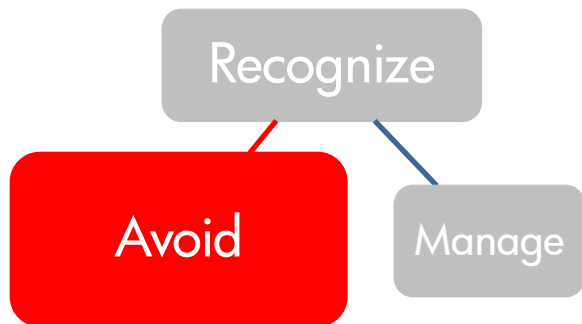
If YES, is anything competing with my professional duty to my clients?

If YES, is the competing consideration so significant that a reasonable person would say I am acting in my own interests above those of my clients?

If NO, there should be no conflict of interest.

If YES, avoid the situation entirely.

If NO, what safeguards could be put in place to adequately address the concern?



## Scenario 4: AVOID Referring for Profit

# AVOID

The RD's professional judgment is being influenced by financial gain rather than client need.



```
graph TD; Recognize[Recognize] --- Avoid[Avoid]; Recognize --- Manage[Manage];
```

Recognize

Avoid

Manage

## Scenario 5: Receiving Referrals

An RD recently started a private practice and is having difficulty growing her business. To generate more clients, she offers a therapist that she knows 10% of the initial consultation fee for every new client that he refers to her.

Should the RD be paying someone for referrals?

Recognize

Avoid

Manage

## Scenario 5: Assess the Situation Referring for Profit

### AM I IN A CONFLICT OF INTEREST?

Ask yourself:  
Is anyone relying on my professional judgment in this situation?

If NO, there should be no conflict of interest.

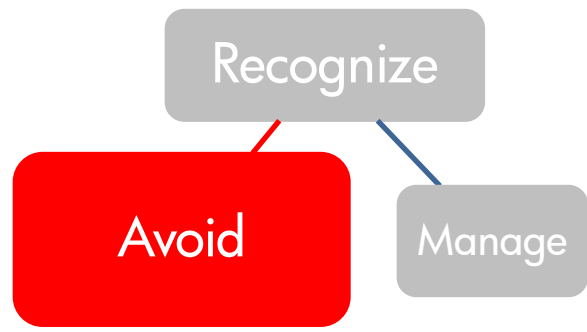
If YES, is anything competing with my professional duty to my clients?

If YES, is the competing consideration so significant that a reasonable person would say I am acting in my own interests above those of my clients?

If NO, there should be no conflict of interest.

If YES, avoid the situation entirely.

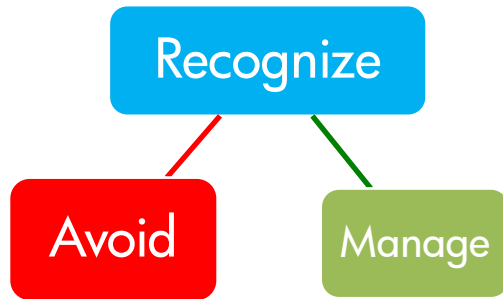
If NO, what safeguards could be put in place to adequately address the concern?



## Scenario 5: AVOID Receiving Referrals

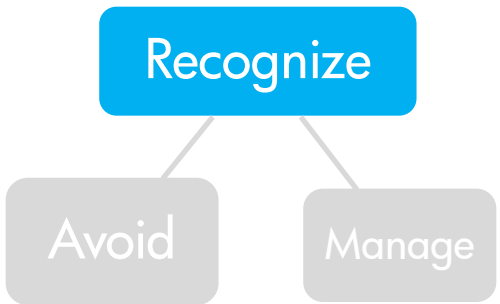
# AVOID

The RD's professional judgment is influenced by financial gain rather than client need.



## Scenario 6: Referring Clients to Programs

Are RDs in a conflict of interest if they refer their clients to nutrition programs in grocery store chains?



# Scenario 6: Assess the Situation Referring Clients to Programs

Benefit to Client	Benefit to RD	Conflict of Interest
Yes	No	NO
No	Yes	YES
Yes	Yes	MAYBE





POTENTIAL FOR  
PERCEIVED COI

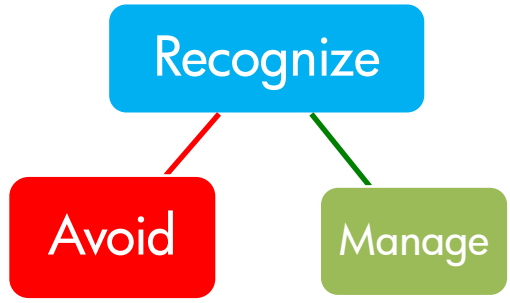
## Scenario 6: TIPS Referring Clients to Programs

---

### TIPS

- Specify no benefit to RD
- Inform all clients and colleagues of in-store nutrition programs available
- Product recommendations are based on nutrition profiles not brand names





## Scenario 7: Referring Clients to Private Practice

An inpatient hospital RD in a rural area starts a private practice to service clients in the community.

Can the RD recommend that her discharged hospital patients come and see her in her private practice?

Recognize

Avoid

Manage

## Scenario 7: Assess the Situation Referring Clients to Private Practice

### AM I IN A CONFLICT OF INTEREST?

Ask yourself:  
Is anyone relying on my professional judgment in this situation?

If NO, there should be no conflict of interest.

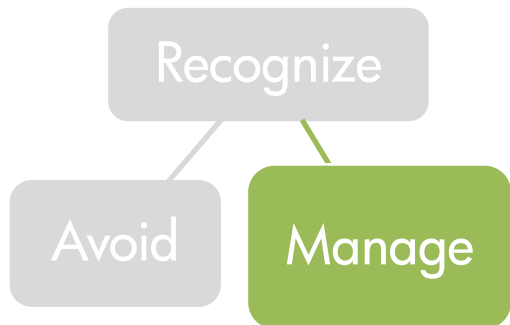
If YES, is anything competing with my professional duty to my clients?

If YES, is the competing consideration so significant that a reasonable person would say I am acting in my own interests above those of my clients?

If NO, there should be no conflict of interest.

If YES, avoid the situation entirely.

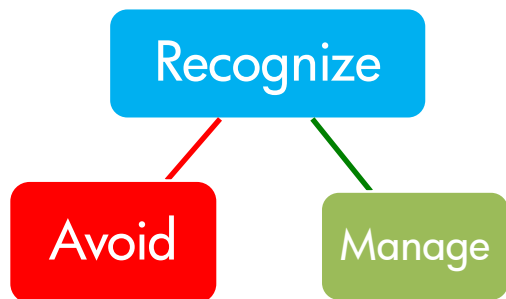
If NO, what safeguards could be put in place to adequately address the concern?



## Scenario 7: **MANAGE** Referring Clients to Private Practice

### **MANAGE**

- Clearly disclose fee-for service private practice
- Provide options for other RD services in community
- Reassure patients there is no obligation
- Create an objective way for RD and others to refer clients



## Scenario 8: Working for a Food Company

An RD works in industry for a food company that sells a variety of products.

Is the RD in a conflict of interest by working for this company?

Recognize

Avoid

Manage

## Scenario 8: Assess the Situation Working for a Food Company

### AM I IN A CONFLICT OF INTEREST?

Ask yourself:  
Is anyone relying on my professional judgment in this situation?

If NO, there should be no conflict of interest.

If YES, is anything competing with my professional duty to my clients?

MAYBE

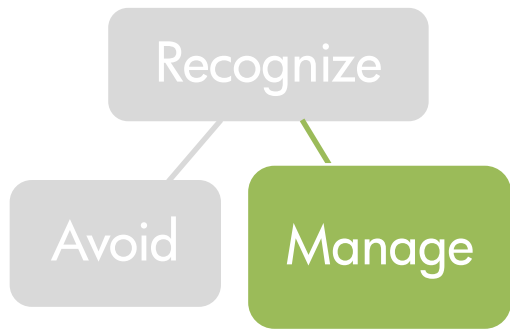
If YES, is the competing consideration so significant that a reasonable person would say I am acting in my own interests above those of my clients?

MAYBE

If NO, there should be no conflict of interest.

If YES, avoid the situation entirely.

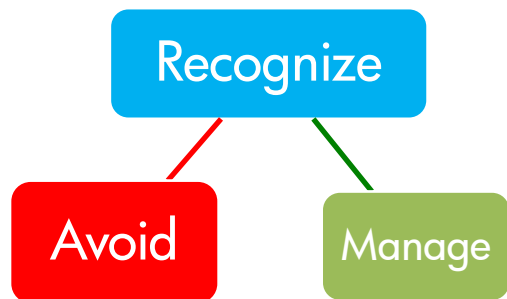
If NO, what safeguards could be put in place to adequately address the concern?



## Scenario 8: MANAGE Working for a Food Company

### MANAGE

- Transparency
- Honest communication
- Evidence-based practice
- There is not the same level of vulnerability when information is being relayed to RDs rather than the public



## Scenario 9: Receiving Gifts

You are the food services manager and make a number of purchasing decisions for your organization. A few of your suppliers have made small gifts to you such as a box of chocolates around the holidays. A supplier is offering to provide a significant financial contribution towards your department's education budget after hearing that it had been cut.

Recognize

Avoid

Manage

## Scenario 9: Assess the Situation Receiving Gifts

### AM I IN A CONFLICT OF INTEREST?

Ask yourself:  
Is anyone relying on my professional judgment in this situation?

If NO, there should be no conflict of interest.

If YES, is anything competing with my professional duty to my clients?

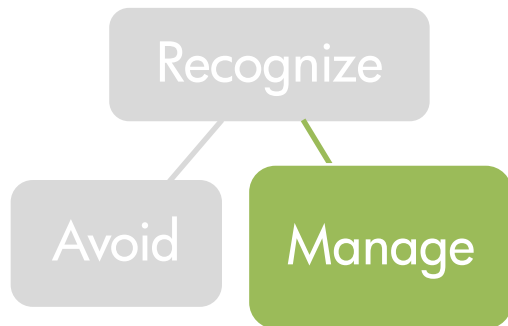
If YES, is the competing consideration so significant that a reasonable person would say I am acting in my own interests above those of my clients?

If NO, there should be no conflict of interest.

If YES, avoid the situation entirely.

If NO, what safeguards could be put in place to adequately address the concern?



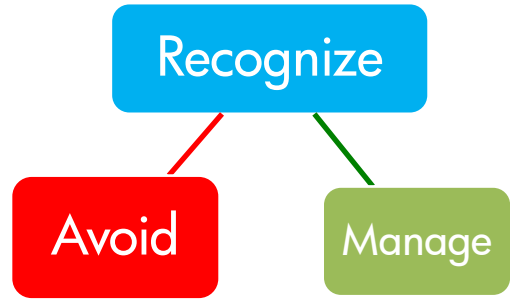


## Scenario 9: MANAGE Receiving Gifts

### MANAGE

#### DORM Principle:

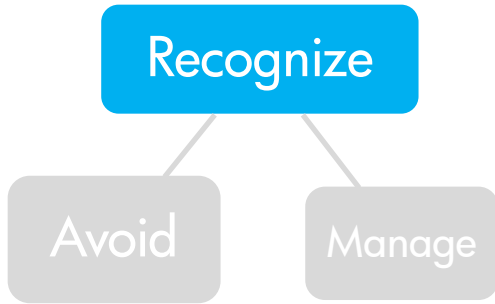
- Discuss with supervisor/employer and disclose the personal benefit
- Present all the vendor options
- Reassure employer of objectivity
- Remove self from decision or accept under certain conditions



## Scenario 10: Recruiting Clients for Research

An RD works part-time in a Canadian Prenatal Nutrition Program (CPNP) while completing her PhD. Her PhD work involves recruiting low income families to learn about family mealtimes and preschool feeding practices. Her CPNP clients fit this criteria.

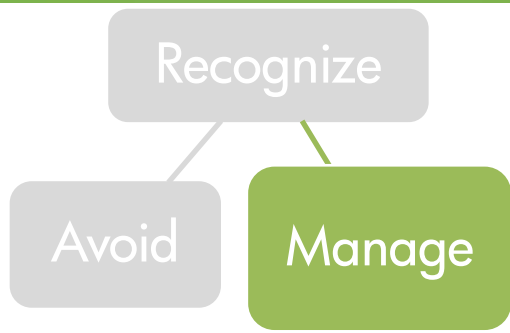
Would it be appropriate for the RD to recruit her CPNP clients to her PhD research study?



# Scenario 10: Assess the Situation Recruiting Clients for Research

Benefit to Client	Benefit to RD	Conflict of Interest
Yes	No	<b>NO</b>
No	Yes	<b>YES</b>
<b>Yes</b>	<b>Yes</b>	<b>MAYBE</b>



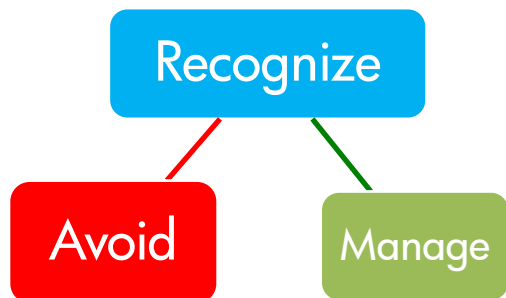


## Scenario 10: **MANAGE** Recruiting Clients for Research

### **MANAGE**

#### **DORM Principle:**

- Clearly disclose information about the research trial
- Specify that participation is voluntary
- Reassure clients that care won't be compromised
- Implement objective recruitment processes



## Scenario 11: Selling Products to Clients

An RD has worked extensively with a pharmaceutical company to develop a line of multivitamin supplements that he feels are superior to other products on the retail market. He sells his supplements directly to his clients in private practice and people can also purchase the products through his website.

Recognize

Avoid

Manage

## Scenario 11: Assess the Situation Selling Supplements to Clients

### AM I IN A CONFLICT OF INTEREST?

Ask yourself:  
Is anyone relying on my professional judgment in this situation?

If NO, there should be no conflict of interest.

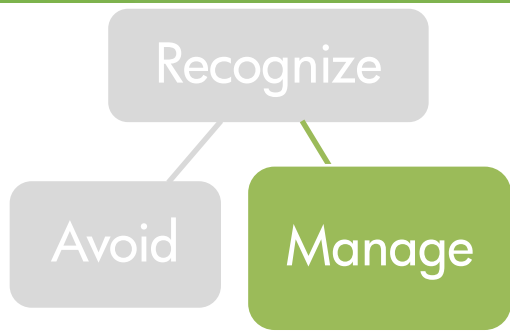
If YES, is anything competing with my professional duty to my clients?

If YES, is the competing consideration so significant that a reasonable person would say I am acting in my own interests above those of my clients?

If NO, there should be no conflict of interest.

If YES, avoid the situation entirely.

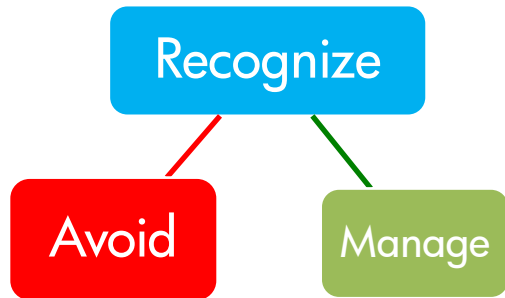
If NO, what safeguards could be put in place to adequately address the concern?



# Scenario 11: MANAGE Selling Products to Clients

## MANAGE

1. Document assessment and multivitamin recommendation.
2. Use the Dorm Principle:
  - Disclose the financial benefit and give information about the supplements
  - Provide options for other products
  - Reassure clients that their care won't be compromised
  - Modify how the supplements are sold



## Scenario 12: Lunch 'n Learns

An RD works in a diabetes education centre. One of the pharmaceutical reps has offered to bring in a catered meal for all staff to participate in a lunch 'n learn about the company's nutritional products.

Can RDs attend?





Recognize

Avoid

Manage

## Scenario 12: Assess the Situation Lunch 'n Learns

### AM I IN A CONFLICT OF INTEREST?

Ask yourself:  
Is anyone relying on my professional judgment in this situation?

If NO, there should be no conflict of interest.

If YES, is anything competing with my professional duty to my clients?

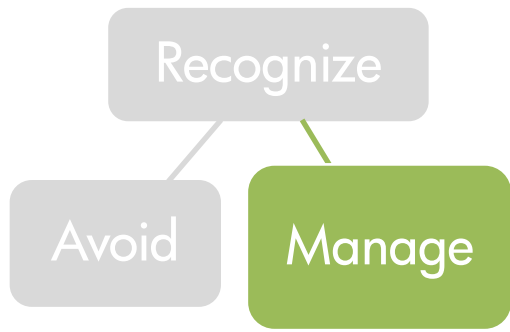
If YES, is the competing consideration so significant that a reasonable person would say I am acting in my own interests above those of my clients?

If NO, there should be no conflict of interest.

**MAYBE**

If YES, avoid the situation entirely.

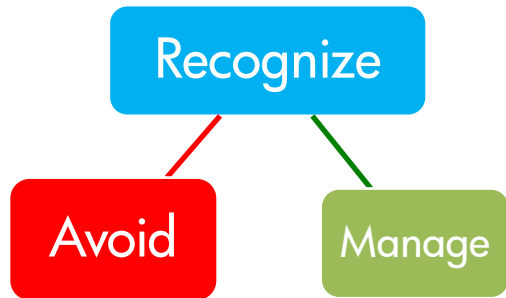
If NO, what safeguards could be put in place to adequately address the concern?



## Scenario 12: **MANAGE** Lunch 'n Learns

### **MANAGE**

- No preferential treatment to company's products
- Ensure evidence-based practice
- Be mindful of cumulative effect
- Follow organizational and program policies



## Scenario 13: Payment for Supervising Learners

An RD accepts the role of supervising an intern. Due to the extra workload on the RD, the intern directly pays the RD for this placement.

Recognize

Avoid

Manage

## Scenario 13: Assess the Situation Payment for Supervising Learners

### AM I IN A CONFLICT OF INTEREST?

Ask yourself:  
Is anyone relying on my professional judgment in this situation?

If NO, there should be no conflict of interest.

If YES, is anything competing with my professional duty to my clients?

If YES, is the competing consideration so significant that a reasonable person would say I am acting in my own interests above those of my clients?

If NO, there should be no conflict of interest.

If YES, avoid the situation entirely.

If NO, what safeguards could be put in place to adequately address the concern?

Recognize

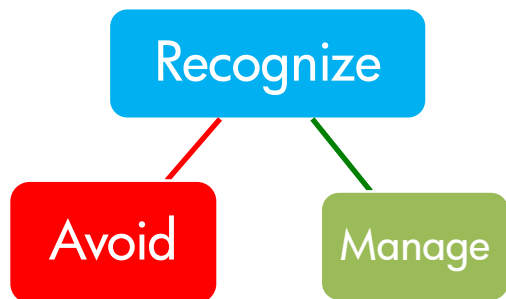
Avoid

Manage

## Scenario 13: AVOID Payment for Supervising Learners

### AVOID

- Direct payment clouds the RD's professional judgment
- Preceptor must be free from conflict of interest or bias
- Accordingly, the College's *Guidelines for Supervision of Learners* (2014) restricts this practice



## Scenario 14: Supervising Relatives

An RD works in a community health centre. The daughter of a second cousin is currently completing her dietetic internship and requests a placement with the community health centre RD.

Is it acceptable for this RD to supervise her relative?

Recognize

Avoid

Manage

## Scenario 14: Assess the Situation Supervising Relatives

### AM I IN A CONFLICT OF INTEREST?

Ask yourself:  
Is anyone relying on my professional judgment in this situation?

If NO, there should be no conflict of interest.

If YES, is anything competing with my professional duty to my clients?

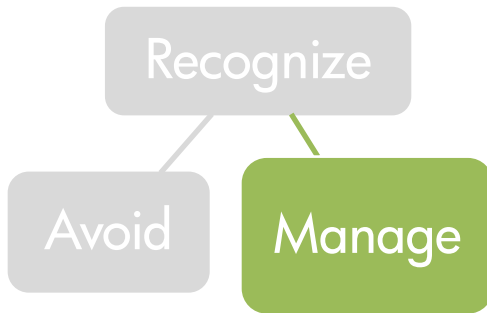
If YES, is the competing consideration so significant that a reasonable person would say I am acting in my own interests above those of my clients?

If NO, there should be no conflict of interest.

**MAYBE**

If YES, avoid the situation entirely.

If NO, what safeguards could be put in place to adequately address the concern?



## Scenario 14: MANAGE Supervising Relatives

### MANAGE

- Personal relationship must be disclosed
- Determine if relationship is free from conflict of interest or bias
- Unclear – obtain alternate supervisor
- Supervisors may need to consult with the College



# Summary

- Conflict of interest occurs when a personal interest may improperly influence an RD's professional judgment.
- RDs must always act in clients' best interests to preserve trust.
- Seek out ways to avoid or minimize perceived conflict of interest.
- Education is the first step to conflict of interest management.
- Situations can be complex; if in doubt, discuss with a colleague or contact the College.

# Resources

- [Jurisprudence Handbook for Dietitians in Ontario](#) – Chapters 9: Conflict of Interest & Chapter 10: Boundary Crossings
- CDO. [Conflict of Interest in Dietetic Practice How to Handle Competing Interests](#)
- CDO. [Conflict of Interest & Dietetic Practice. Guidelines for Supervising Learners \(2014\).](#)
- [Ted Talks](#) – Conflict of Interest



Please feel free to contact the College's  
Practice Advisory Service:

[practiceadvisor@collegeofdietitians.org](mailto:practiceadvisor@collegeofdietitians.org)

416-598-1725; 1-800-668-4990  
ext. 397