

PHSA Research Conflict of Interest

Common COI Examples

The following presents examples of different types of conflicts of interest and what steps may need to be taken to manage them. If there are any questions about whether to disclose an external interest or relationship, please err on the side of full transparency. This will provide an opportunity to discuss your potential or perceived conflicts with your Reviewer, and whether there is a need for a plan to manage such conflicts. You can also contact PHSA Research and Academic Services with any questions or concerns (researchadministration@phsa.ca).

Financial Interests

Equity Interests + PHSA Procurement Role

I own stock in Pharma Co. Because of my research expertise, I have been asked to sit on a PHSA procurement committee that is considering contracting with Pharma Co. for a product. What steps do I take to ensure that I am in compliance with the Research Conflict of Interest Policy?

First, you will need to amend your current PHSA COI declaration form to indicate that you have stock and that you have a role in PHSA procurement. Next, you will need to include a management plan that indicates how you will reduce or eliminate any harm that may arise because of this conflict. You may choose to notify the procurement committee of your interests and recuse yourself from any decisions associated with Pharma Co. You may choose to sell the stock and indicate to the procurement committee that this is the action you have taken. Your Reviewer may consider this conflict too great, possibly because of other interests you have or the value of the stock, to be remedied by these steps and require you to remove yourself from the committee completely. On the other hand, the Reviewer may feel that this interest is not that significant and your input on the purchase is of importance, therefore allowing minimal management to take place. The situation will be evaluated on a case-by-case basis taking into consideration your role at PHSA, the impact of all your interests, and the weight of influence you have over the PHSA business decision.

Equity Interest Related to Research

I am a co-founder of a company that relates to my area of expertise and research. Do I have to disclose this relationship?

Yes, you should disclose this relationship, any active roles you have in the company, and any financial interests you may have with the company (e.g., equity, stocks, salary). Your Reviewer may find that disclosure is sufficient in terms of management, however, it is important that you consult with them to ensure that your research and any foreseeable PHSA roles and responsibilities do not appear tainted due to your outside interest.

Equity Interest + Contracting with PHSA

I have a spin-off company that would like to contract with my PHSA department to purchase its product. What steps do I need to take to make sure this can happen?

You will need to declare this situation in your PHSA COI declaration form. You will need to include a management plan that outlines to your Reviewer how you plan to ensure that this conflict is managed appropriately. Your Reviewer may find that you should not have any involvement in this business dealing, particularly when representing PHSA. You may have to notify those involved in the decision of the conflict. You may also have to disclose this interest to trainees and colleagues.

Related Person Employment + PHSA Contracting

My spouse works for Software Co. The company has a business relationship with PHSA. Do I have a conflict of interest that needs to be declared?

Maybe. If you have any involvement in PHSA decisions that involves Software Co., their competitors, or related areas, then you must declare this conflict of interest. If you are not involved, nor will you be in the foreseeable future, in any areas that influence PHSA business relationships with Software Co. or related companies, nor is the Software Co. related to your area of research in any way, then you do not have to declare this interest. If you are uncertain, it is better to declare and have your Reviewer provide feedback.

Consulting Income + Research Interests

I have a consulting contract in place with Company A. This company also has a relationship with my department at PHSA. However, I currently do not have any influence over that business relationship. Do I need to disclose it?

Yes, you should declare this interest. While you do not have any ability to influence that business relationship, the fact that you are aware of their relationship with PHSA and how this may be perceived by an independent observer, it is best to disclose it. Most likely, no management plan will be needed for approval of your form. More importantly, if you know that in the future you may have the ability to influence this business relationship, or related business relationships, between PHSA and Company A, it is important to declare the interest and ensure that future decisions do not appear biased.

Equity Interest + Sponsored Research

I am a Principal Investigator on a clinical trial sponsored by Pharma Ltd. I have acted as a consultant for and own stock in this company. Everyone is aware of this. Do I really need a management plan?

Yes, you still need a management plan. While you may have provided this information to peers, research colleagues, and study participants, it is necessary to ensure that this plan reduces or removes all harm to the greatest capacity possible. Your Reviewer may not require anything more than documentation that you have notified all appropriate parties. However, they may ask you to do so in writing, to include trainees in your notification process, or incorporate additional provisions in the plan.

Publicly Traded Mutual Funds + Research Interests

I have publicly traded mutual funds that invest of several of the pharmaceutical companies that develop products related to my area of research and have even funded my research in the past. How do I disclose this financial interest?

Any equity interests you or your family members have in publicly traded mutual funds, pension or other investments that are outside your direct control (i.e., you are not actively trading stock of specific company), do not need to be disclosed.

University Salary

I receive a salary from my position with a university, in addition to the grant-funded research I conduct at PHSA. Should I disclose this income?

No, you do not need to disclose any salary income you receive from a PHSA-affiliated university.

External Interests

Volunteer Position + Research Interests

I volunteer at a local non-profit dental clinic on weekends. Do I need to disclose this external interest?

No, you do not need to declare this interest unless it conflicts with one of your roles or research at PHSA. For instance, if you are studying health outcomes on patients visiting non-profit dental clinics in comparison with those who visit for-profit clinics, you would need to declare this interest.

Board Position + Research Interests

I sit on the board of a community garden organization. Do I need to disclose this external interest?

No, you do not need to disclose this interest since it does not conflict with your roles or research at PHSA.

Consultant + Potential PHSA Contractor

I have been asked to act as a consultant, unpaid, for a smaller pharmaceutical company because of my expertise.

Currently, I do not have any research projects that conflict with this, and this company does not have any relationship with PHSA. Do I need to declare this?

Yes, you should declare this interest. There is possibility that it will be a conflict with future research or that the company will develop a business relationship with PHSA.

Related Person Board Position + Research Interest

My brother sits on the board of directors for Pharma C Co. He does so because it relates to his field of business as an independent consultant for biotech companies. I am supposed to be Principal Investigator in a clinical trial being conducted at PHSA on a Pharma C Co. product. Can I act as PI?

Whether you can act as a PI will be up to the determination of your Reviewer. You must disclose this information in your COI form and propose how you plan to manage this conflict. Depending on the circumstances, your Reviewer may decide that the conflict is not concerning and that notification to research colleagues is all that is required. However, your Reviewer may feel that an independent observer would question your research results and decides that notification to human subjects, peers, trainees, and/or at presentations and in publications is appropriate. They may also find that because of the importance of this trial and your role that it is important that verification of data and manuscripts is conducted by co-investigators.

Consultant + Research Interests

Based on my experience and research area, I have been asked to be participate in an expert panel for a clinical guideline development process. Should I disclose this?

Yes, if you participate in a process to establish guidelines, standards, recommendations that could influence your research field and clinical practice, it is important to disclose this relationship. Work with your Reviewer to establish how this external relationship may influence your PHSA roles and responsibilities and develop a plan to manage any conflict of interest situations.

Sponsored Meals

Sponsored Event Meals

Pharma Industry is providing a training seminar at a PHSA hospital during lunch and is providing snacks. My research assistant and lab manager plan to attend. I also plan to attend and would like to partake in the snacks. However, I am not sure if I can since I sit on a committee that often purchases items from Pharma Industry.

Yes, you may partake in the snacks, if they are offered to all seminar participants, are not the main purpose of the event, and are minimal value. However, please be aware that accepting any gifts (e.g., pens, meals) has the potential to influence

your future decision making. Your research assistant and lab manager are also able to enjoy the snacks, if the provided snacks meet the criteria listed above.

Sponsored Meal + Close Friend + PHSA Contracting

A computer sales representative, who is also a friend, has offered to take me out to lunch. I know that this representative has a few relationships with PHSA. I do not have any influence over the relationship between this representative and their business relationship with PHSA. Can I go to lunch and have them pay?

If you do not have any control or influence over the relationship between PHSA and the industry for which the computer sales representative works, then you can go out to lunch, and they can pay. In this scenario, it is a lunch between friends and not a business lunch. However, if your role with PHSA procurement changes and you do have influence over the business relationship between this industry and PHSA, you will no longer be able to accept these lunches. If you foresee this happening, you should consider whether to accept payment for these lunches since an independent observer may find this relationship questionable and your decisions biased.

Sponsored Meal + Research Interests

Pharma Co. has offered to take me out for a business dinner to discuss my research. It is important that I attend this dinner since they may choose to provide financial support for research in my field in the future. Can they pay for the meal?

Yes, in discussing potential research collaboration and funding opportunities, you may accept modest meals from external businesses and individuals if you are not able to pay for your own meal. However, this is an exception to PHSA Research Conflict of Interest policy's regarding the acceptance of gifts and this exception should be used infrequently. Also, the meal should be of nominal value and not the primary purpose of the meeting.

Sponsored Conference Meal + Research Interest

I am attending a conference in Toronto next week. One of the lunches is hosted by a pharmaceutical industry. The lunch is open to all attendees of the conference. Can I go to the conference lunch?

Yes, you can attend the conference lunch. Because it is during conference hours, open to all attendees, and considered part of your conference registration, it is not considered a gift. However, if the meal was limited to invited guests only or conducted after conference hours, then it would be viewed as an industry paid meal and could not be accepted.

Sponsored Travel

Industry Sponsored Travel + Research Interests

I have been asked by Pharma Co. to attend a meeting in Ottawa with some of peers to discuss advances in my field. This meeting is important because it will influence what Pharma Co. funds in terms of R&D. Pharma Co. has offered to pay for my flight, meals, and accommodation. What is the procedure that I follow to have Pharma Co. pay for my trip?

Researchers are permitted to accept travel, accommodation, conference fees and related meals from external businesses and individuals if the Researcher is a genuine consultant or participant (e.g., planning, presenting). Before accepting the offer for your trip to be paid for, you must log into your declaration form and amend the travel section. You will need to provide information on the costs and the time you will be away. You may also choose to include in the "other information section" notes on why this trip is important. Your Reviewer will need to consider if the value and duration of the trip is reasonable, as well as what other roles you have with PHSA that may appear to be tainted by this trip. If the Reviewer

finds that there is not a significant conflict, they can approve the trip. Please refer to PHSA's [Travel and Business Expense Policy](#) for more information.

Non-profit Sponsored Travel + Research Interests

A non-profit organization has asked me to present at one of their conferences. They would like to pay for my flight, accommodations, and meals. Can I accept this offer?

Yes, you can accept the payment for costs associated with the trip if they are reasonable. However, if you know that the message of the conference or non-profit organization contradicts that of the values or mission of PHSA, you should declare this travel and get advice from your Reviewer.

Sponsored Meal + PHSA Role/Contracting

Because of my research in my field, I have been asked to sit on a PHSA procurement committee. Recently, a Tech Industry has offered to fly me out to San Diego to demonstrate their recent products. Can I have them pay for my travel costs?

No, you cannot have Tech Industry pay for your travel costs. Because you could influence a business relationship between PHSA and this industry, you may be, or appear to be, biased in your decision-making role at PHSA if you accept the paid travel.

Gifts

Industry Gifts

Pharma Co. sends my department a gift basket each Christmas. Can I accept the basket this year under PHSA's [Research Conflict of Interest Policy](#) and [Standards of Conduct Policy](#) ?

No, you cannot accept the gift basket unless it is of minimal value, and you have no ability to influence the business relationship PHSA has with Pharma Co. Please inform Pharma Co. of PHSA's gift policy and why you are not able to accept the gift basket. If you cannot do so, you may donate the basket to a non-profit organization or place it in a public area for the benefit of any person.

Industry Gifts

In the past, I have gone to Canucks games with Pharma Co. Can I accept these tickets under the current policies?

No, you cannot accept the Canucks tickets, even if you have no ability to influence the business relationship between Pharma Co. and PHSA. The value of the tickets is significant and is not permissible under PHSA policies.

Questions or Concerns?

Please contact Research and Academic Services staff at researchadministration@phsa.ca with any questions or concerns regarding the PHSA Conflict of Interest declaration and review process.