
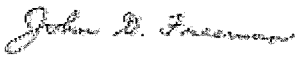
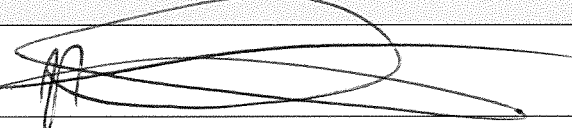


<b>Section 100:</b>	<b>General Administration</b>
<b>Title:</b>	<b>Conflicts of Interest (COI) and Confidentiality Agreements: GREB Members and Office Personnel</b>
<b>SOP Code:</b>	<b>105A.002</b>
<b>Effective Date:</b>	<b>2016MAY19</b>

## Site Approvals

Signature of Responsible Individual:		
Ethics Compliance Advisor		
	Name: Anthony Wright	Date: 2016MAY19
Approval Authority:		
Chair, GREB		
	Name: Dr. John Freeman	Date: 2016MAY19
Approval Authority:		
Director, Research Ethics Compliance		
	Name: Dr. Andrew Winterborn	Date: 2016MAY19

## 1.0 PURPOSE

This SOP describes potential Conflicts of Interest (COI) for GREB members (including the GREB Chair and any ad hoc advisors) and GREB office personnel. It describes the requirements and procedures for disclosure and management of COI.

## 2.0 SCOPE

The scope of this SOP is restricted to the review of the ethical conduct of research involving humans that falls under GREB's oversight. GREB primarily has research ethics oversight over Humanities, Social Sciences, Science, Engineering, and administrative research conducted under the auspice of Queen's University. The scope of GREB's oversight is limited to those activities defined in the TCPS2 (2014) as "research" involving "human participants."

### **3.0 RESPONSIBILITIES**

All GREB members and GREB office personnel are responsible for disclosing any real, potential, or perceived COI and for ensuring that the requirements of this SOP are met.

### **4.0 DEFINITIONS**

See Glossary of Terms.

### **5.0 PROCEDURES**

Conflict of Interest (COI) is defined as: the incompatibility of two or more duties, responsibilities, or interests (personal or professional) of an individual or institution as they relate to the ethical conduct of research, such that one cannot be fulfilled without compromising another (TCPS2, 2014).

A COI (real, potential, or perceived) may arise when individuals are placed in a situation where their professional, personal, or financial interests conflict with their responsibilities to GREB. The most common type of COI occurs when individuals are directly involved in a research project that has been submitted for GREB review or have a friend/colleague involved in the research. COI may also be an issue if individuals have a financial interest in the research project or a relationship with a funder or sponsor. Such competing interests may influence their professional judgment, objectivity, and independence and can potentially influence the outcome of a GREB decision for personal benefit. A COI may exist even if no unethical or improper act results from the conflict. More information is available in Chapter 7 of TCPS2.

GREB must be perceived to be fair and impartial, immune from pressure by the sponsor, Queen's University, the researchers whose research is being reviewed, or other professional and/or non-professional sources. GREB should identify and manage

COI to maintain the confidence and trust of the public, the institution, researchers, and colleagues, and to maintain the independence and integrity of the ethics review.

The standard that guides decisions about determining COI is whether or not an independent observer could reasonably question that the individual's actions or decisions are based on factors other than the rights, welfare, and safety of the participants.

If a COI cannot be avoided, the following procedures are designed to mitigate the conflict:

## **5.1 Delegated Reviews**

- 5.1.1 GREB members are not assigned delegated reviews from their home department;
- 5.1.2 The GREB Chair or designee will assess projects undergoing the delegated review process to determine potential COI;
- 5.1.3 If a review is assigned where there is a COI or perceived COI, the reviewer must contact the GREB Coordinator about this concern;
- 5.1.4 If a COI is identified, the project is assigned to another GREB member.

## **5.2 Full Board Review**

- 5.2.1 For full board reviews, the GREB Chair or designee reviews the agenda prior to the GREB meeting to identify potential COI.
- 5.2.2 When the full board agenda is distributed, GREB members are expected to contact the GREB Coordinator, as soon as possible, about a COI, so that another member can be assigned the file;
- 5.2.3 GREB members are reminded of their obligation to orally disclose/declare any real, potential, or perceived COI at the start of each full board meeting;

- 5.2.4 If a COI is declared, the GREB member may be asked to leave the room during discussions of the research project or may be asked to remain to provide further information about the research project;
- 5.2.5 The COI member must not become involved in the deliberation or the decision;
- 5.2.6 The GREB member's recusal will be recorded in the minutes, and the GREB member will not be counted towards quorum.

### **5.3 GREB Chair**

- 5.3.1 In the event that the GREB Chair declares a COI, the Vice-Chair or alternate GREB member will assume the GREB Chair's responsibilities for the specific project(s).

### **5.4 GREB Office Personnel**

- 5.4.1 At the time of hiring, all GREB office personnel sign a Confidentiality Agreement and Conflict of Interest Disclosure Form as a condition of their employment with Queen's University agreeing to abide by the COI and confidentiality policies of Queen's University. GREB office personnel must also comply with GREB COI SOPs;
- 5.4.2 All GREB office personnel are expected to disclose any conflicts that arise. Any GREB office personnel whose job status or compensation is impacted by research that is reviewed by the GREB must excuse themselves when such research is reviewed (e.g., GREB office personnel work with a researcher who has submitted a research application; GREB office personnel have a vested interest in the findings of a research project);
- 5.4.3 Any disclosure of a COI by GREB office personnel should be referred to the Director of Research Ethics Compliance for the development of a management plan;

5.4.4 If GREB office personnel are unclear as to whether or not a COI exists, they must contact the GREB Chair or designee or the Director of Research Ethics Compliance to seek clarification. The Director of Research Ethics Compliance shall determine whether the circumstances should be defined as a COI.

## **5.5 External Ad Hoc Advisors**

5.5.1 At the GREB Chair's or designee's discretion, individuals with competence in special areas to assist in a review may be invited to the GREB meeting for their expertise;

5.5.2 All ad hoc advisors must sign a Confidentiality Agreement and Conflict of Interest Disclosure Form prior to commencement of their consultation, disclosing any COI to the GREB Chair or designee;

5.5.3 Any disclosure of a COI by an ad hoc advisor should be referred to the GREB Chair or designee for the development of a management plan, as applicable;

5.5.4 If ad hoc advisors are unclear as to whether or not a COI exists, they must contact the GREB Chair or designee to seek clarification. The GREB Chair or designee will determine whether the circumstances should be defined as a COI.

## **5.6 Documentation**

5.6.1 GREB members sign a Confidentiality Agreement and Conflict of Interest Disclosure Form when they first join GREB;

5.6.2 All GREB members are reminded of their Confidentiality Agreement and asked about any COI at each GREB meeting;

5.6.3 All visitors and ad hoc advisors sign a Confidentiality Agreement and Conflict of Interest Disclosure Form and agree to abide by these policies;

- 5.6.4 The signed Confidentiality Agreements and Conflict of Interest Disclosure Forms will be filed in the Office of Research Ethics;
- 5.6.5 GREB minutes will record:
  - a) Any COI that is declared on any of the projects under review,
  - b) The management plan to address the conflict if applicable,
  - c) The recusal of a GREB member.
- 5.6.6 The GREB management plan for Research COI declarations will be documented in the appropriate research files.

## **6.0 REFERENCES**

See References.

## **7.0 APPENDICES**

1. Confidentiality Agreement – GREB Members
2. Confidentiality Agreement – GREB Staff
3. Confidentiality Agreement – GREB Visitors
4. Confidentiality Agreement – GREB Ad Hoc Advisors
5. Confidentiality Agreement – GREB Alternate Members
6. Conflict of Interest – GREB Members
7. Conflict of Interest – GREB Staff
8. Conflict of Interest – GREB Visitors
9. Conflict of Interest – GREB Ad Hoc Advisors
10. Conflict of Interest – GREB Alternate Members

## 8.0 REVISION HISTORY

SOP Title	Version	Updates
Conflict of Interest: GREB Members and Office Personnel	v.105A.001 2016FEB08	Original: This SOP was developed based on information from the TCPS2 (2014) and Queen's University previous documents or policies (using the format of CAREB/N2).
	v.105A.002 2016MAY19	Added COI appendices

