

Examples

Below are examples of different types of conflicts of interest and what steps may need to be taken to manage the conflict.

Financial Interests

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.

I have a spin-off company that would like to contract with my PHSA department to purchase our 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.

My wife 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 have no involvement, nor will you in the foreseeable future, in any areas that influence PHSA business relationships with Software Co. or related companies, then you do not have to declare this interest. If you are uncertain, it is better to declare and have your Reviewer provide feedback.

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.

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 and research colleagues, it is necessary to ensure that this plan reduces or removes all harm to the greatest capacity possible. Your Reviewer may not require anymore than documentation that you have notified all appropriate parties. However, he/she may wish you to do so in writing, to include trainees in your notification process, or incorporate additional provisions in the plan.

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. Your Reviewer may find that disclosure is sufficient enough in terms of management, however, it is important that you consult with him/her to ensure that your research and any foreseeable PHSA roles do not appear tainted due to your outside interest.

External 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.

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.

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.

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. He/she 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.

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.

You are not able to accept the snacks provided by Pharma Industry because you are able to influence a related business relationship between this industry and PHSA. However, your research assistant and lab manager are able to enjoy the snacks, as long as they are of low intrinsic value (less than \$25), because they do not sit on a committee or hold roles that permit them the kind of influence you have in procurement from Pharma Industry. If you wish to, you can partake in the snacks and pay for them yourself and submit for reimbursement under the PHSA [Travel and Business Expense Policy FIN – 200](#).

A computer sales representative has offered to take me out to lunch. I know that this representative has a number of relationships with PHSA. I do not have any influence over the relationship between this representative and her business relationship with PHSA. Can I go to lunch and have her 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 she 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 or not to accept payment for these lunches since an independent observer may find this relationship questionable and your decisions biased.

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?

No, you may not accept payment for this meal. While PHSA understands the value in this relationship between you and Pharma Co., we also recognize that it is important to have the appearance that there is no bias in PHSA research. We encourage you to meet with Pharma Co. and, if you decide to do so over dinner, you should pay for the meal and submit the receipts as dictated by the PHSA [Travel and Business Expense Policy FIN – 200](#).

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.

Travel

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?

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 period you will be away. You may also choose to include in the “other information section” information 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 he/she can approve the trip.

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 as long as 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.

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 have the ability to influence a business relationship between PHSA and this industry, you may be, or appear to be, biased in your decision-making role at PHSA.

Gifts

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

No, you cannot accept the gift basket unless it is under \$25 and you have no ability to influence the business relationship PHSA has with Pharma Co. Please inform Pharma Co. of our new policy and why you are no longer 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.

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 over \$25 and is not permissible under PHSA policies.