

<b>Title</b>	<b>Conflicts of Interest – Researcher</b>
<b>SOP Code</b>	105B.001
<b>Effective Date</b>	2022-NOV-04

### Site Approvals

<b>Name and Title</b>	<b>Signature</b>	<b>Date (yyyy.mm.dd)</b>
Dr. Lynne Lafave CHAIR, HREB	<i>LLafave</i>	2022.11.04
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## 1.0 PURPOSE

This standard operating procedure (SOP) describes potential Conflicts of Interest (COI) for Researchers and research team members engaged in human participant research, and the requirements and procedures for disclosure and managing COI.

## 2.0 SCOPE

This SOP pertains to the Human Research Ethics Board (HREB), Mount Royal University.

## 3.0 RESPONSIBILITIES

All HREB members, HREB Office Personnel and Researchers are responsible for ensuring that the requirements of this SOP are met.

Researchers are responsible for disclosing any real, potential or perceived COI to the REB.

The HREB is responsible for determining whether the disclosed COI is likely to affect or appear to affect the design, conduct, or reporting of the research

## **4.0 DEFINITIONS**

See Glossary of Terms.

## **5.0 PROCEDURE**

COI (real, potential or perceived) arise when an individual in a position of trust has competing professional or personal interests. Such competing interests may influence his or her professional judgment, objectivity and independence and can potentially influence the outcome of a decision, for personal benefit. A COI may exist even if no unethical or improper act results from the conflict.

Researchers and research team members should identify and manage COI to maintain public confidence and trust and to maintain the independence and integrity of the research process. If a COI cannot be avoided, procedures should be in place to manage and/or to mitigate the conflict.

The standard that guides decisions about considering COI is whether an independent observer could reasonably question whether the individual's actions or decisions could be influenced by factors other than the rights, welfare and safety of research participants.

### **5.1 Researcher Disclosure of Conflicts of Interest**

5.1.1 Researchers submitting research applications to the HREB are required to declare any COI including those of his/her sub/co-Researcher(s), research team members, and immediate family members (which includes spouse, domestic partners and dependent child), and close relationships;

5.1.3 Such disclosures shall be in writing and sufficiently detailed to allow accurate and objective evaluation of conflict;

5.1.4 The Researcher shall disclose any conflicts to the HREB at the following times:

- With the initial HREB application,
- At each continuing review of the project,
- Whenever a COI arises, such as changes in responsibilities or financial circumstances;

- 5.1.5 The Researcher shall cooperate with the HREB and with other Organizational representatives involved in the review of the pertinent facts and circumstances regarding any COI disclosed, and shall comply with all the requirements of the HREB and with his/her organizational COI policies to eliminate and/or to manage the conflict;
- 5.1.6 The Researcher shall ensure that all requirements from any COI reviews are appropriately incorporated into the corresponding informed consent documents and research, as applicable.

## **5.2 REB Review of Researcher Conflict of Interest**

- 5.2.1 The HREB will review each application for disclosure of COI;
- 5.2.2 If the Researcher indicates on the HREB application that a conflict exists, the HREB will determine whether the disclosed COI is likely to affect or appear to affect the design, conduct, or reporting of the research;
- 5.2.3 The HREB review shall focus on those aspects of the COI that may reasonably affect human participant protection and the steps taken should be context-based and commensurate with the risks;
- 5.2.4 In determining the appropriate action, the HREB may take into consideration information presented by the Researcher such as:
- The nature of the research,
  - The magnitude of the interest or the degree to which the conflict is related to the research,
  - The extent to which the interest could affect the research,
  - Whether a specific individual is unique in his/her clinical or scientific qualifications to conduct the research,
  - The degree of risk to human participants involved in the research that is inherent in the research, and/or
  - The management plan for the COI already developed by the Researcher;
- 5.2.5 The HREB may approve the research and may require a management plan, which may include changes at the Researcher's or sponsor's/funder's expense, to eliminate or to mitigate the conflict. Required actions may include, but are not limited to:

- Divestiture or termination of relevant economic interests,
- Mandating Researcher recusal from research,
- Modifying or limiting the participation of the Researcher in all or in a portion of the research,
- Monitoring research (i.e., independent review of data and other retrospective review for bias, objectivity, comprehensiveness of reporting (versus withholding data)),
- Monitoring the consent process, and/or
- Disclosure of the conflict to organizational committees, research participants, and journals;

5.2.6 The HREB has the final authority to determine whether a COI has been eliminated or managed appropriately;

5.2.7 Any COI management plan will be documented in the final project files. Any discussions at the HREB meeting regarding the COI and the management plan will be documented in the HREB meeting minutes;

5.2.8 After review by the HREB and input by the appropriate Organizational Official, if applicable, the HREB may reject research that involves a COI that cannot be appropriately managed.

## 6.0 REFERENCES

See References.

## 7.0 REVISION HISTORY

SOP Code	Effective Date	Summary of Changes
SOP 105B.001	2022.11.04	Original version