

## GENERAL INFORMATION

As members of a public institution, McGill community members are required to conduct their activities in a way that bears public scrutiny and maintains the trust and integrity of the University. This includes taking measures to ensure that our academic activities are guided, first and foremost, by McGill's academic mission rather than by our own self-interest.

A **financial conflict of interest** (COI) may arise when a reasonable person might perceive that an applicant's *actual or potential* financial interests or relationships (including relationships with private companies/industry) might compromise their professional judgment in relation to:

- conducting or reporting research;
- supervising students or trainees; or
- any other aspect of their academic duties.

It is important to note that, by itself, a COI is **not** necessarily misconduct. Rather, COIs are problematic when they are:

- unidentified
- undisclosed
- unmanaged or unmanageable

McGill expects its community members to monitor their own activities and to be aware of actual and potential COIs. Where they perceive that a COI has arisen or may arise, they must immediately disclose this pursuant the terms of the present form, which must be reviewed by:

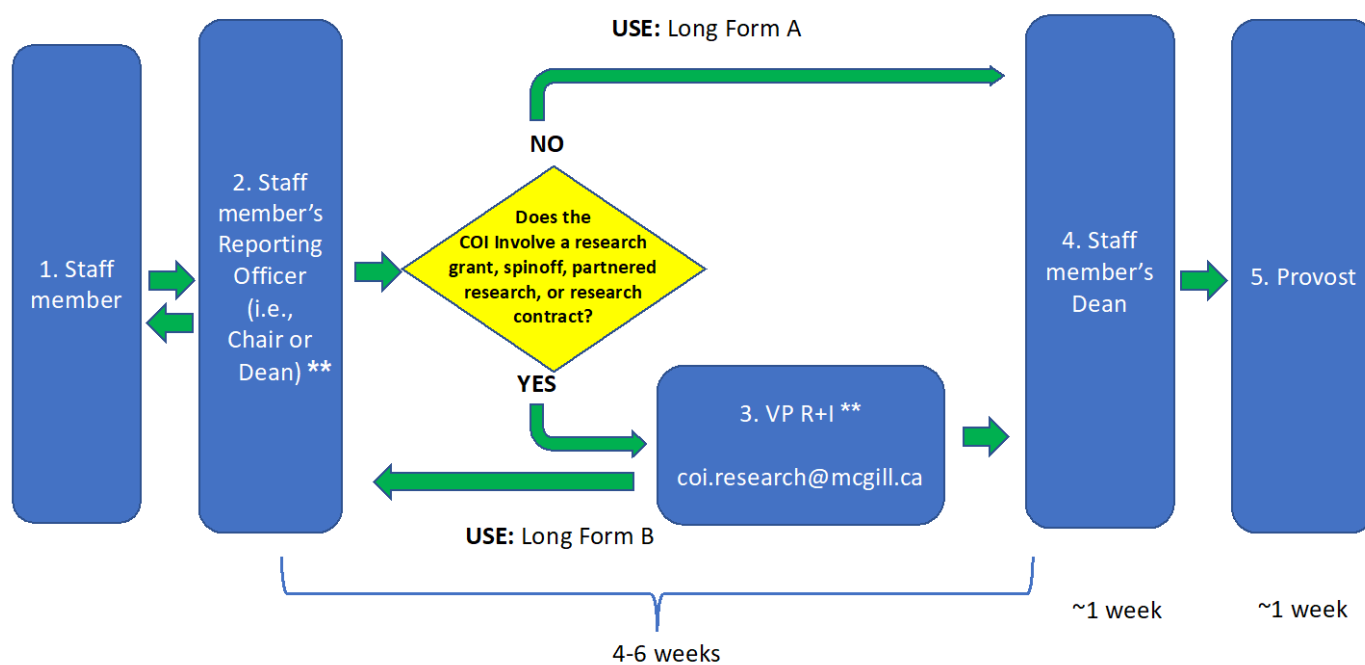
- the applicant's reporting officer (the Chair or Director, in most instances)
- the Vice-Principal (Research & Innovation) (in cases involving research activities)
- the applicant's Faculty Dean
- the Provost & Vice-Principal (Academic)

**in this order.**

All of the foregoing is set out in the University's [Regulation on Conflict of Interest](#) ("Regulation").

## Reporting Conflicts of Interest

This chart outlines the process for COI reporting\*



\*\* Bilateral arrows between steps 1 and 2, and between steps 2 and 3, reflect the potential requirement for multiple updates and exchanges, depending on complexity of the case.

\*This process is the same for all applicants, including students.

**THIS COI REPORTING FORM IS DIVIDED INTO 5 PARTS:****PART 1: Applicant's Disclosure:**

Completion of this supplemental form is **mandatory** if you indicated an actual or potential financial conflict on the [Statement of Conflict of Interest \(Short\) form](#).

**\*\*NOTE:** Before completing this document, review Appendix A, which includes the elements essential to a complete COI report. Refer to **Appendix A** as you complete all sections of Part 1 of this Report, so as to ensure accuracy and completion of the information provided.

Once you have completed and signed this report, please forward this to the Vice-Principal (Research & Innovation) if your case involves research activities. It should then be submitted to your Reporting Officer. Reporting Officers include Chairs/Directors for members of academic staff, and Deans for Chairs/Directors. See Appendix at the end of this document or s.1.9 of the Regulation.

**PART 2: Review by Reporting Officer (Chair/Director) (see Appendix B)**

It is incumbent on the applicant's direct reporting officer (the Chair of Director, in most instances) to review this disclosure report to ensure that the information provided is complete and accurate. Any questions can be directed:

- in the case of COIs related to research activities, to the Vice-Principal (Research & Innovation)
- in the case of other COIs, to the Associate Provost (Equity & Academic Policies)

The Reporting Officer should not sign off on this report until they are satisfied, pursuant to consultation with the actors listed immediately above, that the report is accurate and complete. This includes the provision of information set out in Appendix A.

It is important to note that the Reporting Officer's review may require several exchanges with the Vice-Principal (Research & Innovation) and/or Associate Provost (Equity & Academic Policies) to ensure the accuracy and completion of the report before signing off and moving the report to the next step in COI review process.

**PART 3: Review by the Vice-Principal (Research and Innovation)**

**\*\*** For COI declarations that have research implications.

**PART 4: Dean's Review****PART 5: Review by the Provost & Vice-Principal (Academic)**

**NOTE:** The University commits to doing its best to ensuring that each stage of review (reporting Officer, Dean, and Provost & VP(RI)) takes no more than 3 weeks.

**APPLICANT INFORMATION****NAME:** \_\_\_\_\_**RANK/POSITION TITLE:** \_\_\_\_\_**DEPARTMENT:** \_\_\_\_\_

This Disclosure relates to:

Annual Disclosure Statement

Date: \_\_\_\_\_

DD-MMM-YYYY

Revised/Updated Disclosure Statement

Date: \_\_\_\_\_

DD-MMM-YYYY

Funded Application (if applicable)

Date: \_\_\_\_\_

DD-MMM-YYYY

Title and Funding Source (if applicable) \_\_\_\_\_

## PART 1: APPLICANT'S DISCLOSURE

### NOTES:

- External funding (such as honoraria, fees, travel expenses) paid for by an institution of higher education, an affiliated research institute, an academic teaching hospital, a medical centre, or by a federal, provincial, or local government agency does not create a COI and does not have to be disclosed.
- Be sure to consult Appendix A to ensure that information provided is complete and accurate.
- It may be the case that a disclosure report is similar to one filed by an applicant in the year prior. It is rarely the case, however, that the report will be identical. As such, annual reports must be filed. It is acceptable to refer back to the prior year's report, and to signal any change in circumstances.

### 1 STATEMENT OF RELEVANT FACTS

Use this section to explain all relevant facts that have given rise to the actual or potential COI concerned.

Indicate any situation where, within the past 12 months:

- you participated in a research project in which you have, or a related party<sup>1</sup> has, an actual or potential financial interest.
- you or a related party had an actual or potential financial interest in a business engaged in activities closely related to your research at the University.
- you supervised students or trainees (including postdoctoral fellows) who participate in the activities of a business, or are employed by a business, in which you or a related party have an actual or potential financial interest. This includes start-ups or spinoffs, in which you or a related party have an interest, generated by University research activities.
- you used McGill resources (e.g., space, staff, equipment, materials, data, consumables) to conduct activities for a private business in which you have, or a related party has, an actual or potential financial interest. This includes start-ups or spinoffs that have been generated by your University research activities.
- you provided paid consulting services to a private entity with which you/your lab/research team also has a research agreement or contract

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<sup>1</sup> The term “related party” includes (i) immediate family; (ii) a person living in the applicant's household; (iii) a person with whom an applicant has, or had, a close or intimate personal relationship; (iv) a person or any business entity with whom the applicant shares, directly or indirectly, a financial or other interest; or (v) a person or any business entity to whom the Member owes a financial or moral obligation.

- you or a related party received a benefit in the form of sponsored travel from an entity whose interests may influence, or reasonably appear to influence, your McGill duties (i.e., research or teaching). (**NOTE:** this does not include travel sponsored or reimbursed by a federal, provincial, or local government agency, an institution of higher education or an affiliated research institute, an academic teaching hospital, or a medical center).
- you or a related party received a gift whose value exceeding \$500 from an entity whose interests may influence, or reasonably appear to influence your McGill duties (i.e., research or teaching).
- used information you have obtained conducting your academic activities at the University to advance your financial interests, or those of a related party.

*Explain.*

**2 List the persons, including “related parties” involved in the COI described in Question 1:**

*List.*

- 3 Teaching and supervision are at the core to a faculty member’s academic activities. In carrying out teaching and supervision of undergraduate and graduate students, and postdoctoral fellows, members of the McGill community are obliged to ensure that they are guided by the best interests of their students and trainees. It is never acceptable for teaching and supervision activities to be driven by the applicant’s own financial, business, or other personal ends.**

List all persons (including students and trainees) who may be affected by the COI and:

- explain how they will be affected (e.g., restrictions on dissemination of research by individuals involved with this project, ownership of intellectual property by a company in which you or a related party hold equity)
- confirm that they have been duly informed about the COI in writing (see sample letter for students and trainees under the [Resource Documents](#) section, or download the letter [here](#)).

*List and explain.*

- 4 List all persons (including research subjects, students, trainees, co-investigators, journal editors, conference organizers, etc.) who should be made aware of the COI so that they can judge the impact it may have on them.**

*List.*

**5 MANAGEMENT OF CONFLICT**

- a) Explain any benefits, direct or indirect, that may be derived by you or a related party, if the COI is permitted:

*Explain.*

- b) Explain how the COI may directly affect – or reasonably appear to influence – your research, teaching, scholarly activities or administrative responsibilities:

*Explain.*

- c) Explain the steps you propose to take to mitigate/manage the COI.

**NOTE:** All applicants have the responsibility for proposing a viable plan to mitigate and manage the COI with sufficient detail to allow for a careful review and approval. Improvements that will strengthen the plan can be made by the applicant's Reporting Officer, Dean, Vice-Principal (Research & Innovation) or Provost.

*Explain.*



**CERTIFICATION**

In submitting this form, I certify that the above information is true and complete to the best of my knowledge, and that I am in compliance, to the best of my knowledge, with federal law, provincial law, and all University policies related to financial conflicts of interest.

**I will promptly report in writing to my Reporting Officer any change in circumstances that may alter the nature or scope of the conflict or affect its management.**

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**\_ (\*Electronic ) Signature of the Applicant**

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**Date**

\*In the event that an electronic signature is not available, please print this page, sign it, and append a scanned version to your Reporting Officer.

**➔** Send your finalized disclosure (**preferably with an electronic signature and the file electronically enabled**) along with parts 2 and 3 to your Reporting Officer.

**\*Note:** Part 1 is protected once electronically signed.  
To edit the document once signed, remove e-signature, edit, and re-sign to finalize.

**PART 2: REVIEW BY REPORTING OFFICER**

**NOTE:** *As a reporting officer it is your duty to evaluate with diligence this declaration of actual or potential COI. Once you have done so, please sign this assessment, preferably with an electronic signature, and forward the finalized copy of the electronically fillable version to the Dean, and the Provost, as applicable.*

*Should you require support, please contact the Associate Provost (Equity & Academic Policies).*

**REPORTING OFFICER'S NAME:** \_\_\_\_\_

**RO'S RANK/POSITION:** \_\_\_\_\_

**RO'S DEPARTMENT(S)/FACULTY(IES):** \_\_\_\_\_

**1**

<b>a)</b>	In your assessment of the information provided, is there an actual conflict of interest?	YES	NO
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**OR**

<b>b)</b>	In your assessment of the information provided, is there a potential conflict of interest?	YES	NO
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**2**

	Are there any persons, in addition to those identified by the applicant, who should be made aware of the COI? <i>List additional persons:</i>	YES	NO
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**3**

	In your assessment of the situation, will the University be adversely affected by permitting this COI? <i>Explain.</i>	YES	NO
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- |          |   |     |    |
|----------|---|-----|----|
| <b>4</b> | In your assessment of the situation, will the University benefit by permitting this COI?<br><i>Explain.</i>                         | YES | NO |
|          |   |     |    |
| <b>5</b> | In your judgement, should the applicant be permitted to engage in the COI?<br><i>Explain.</i>                                       | YES | NO |
|          |   |     |    |
| <b>6</b> | Please specify the period for which permission should be granted for the applicant to engage in this COI.<br><i>Specify period.</i> |     |    |
|          |   |     |    |
| <b>7</b> | How will you monitor the COI?<br><i>Details.</i>  |     |    |
|          |   |     |    |

**8** Conditions under which the conflict is to be permitted:

- 8.1 Applicant must ensure written disclosure of the conflict to all persons who would be affected by it (and provide evidence of such disclosure).
- 8.2 Applicant must promptly report any change in circumstances that may change the nature or scope of the conflict or affect its management.
- 8.3 Applicant must ***(specify additional conditions, where appropriate):***  
*Specify.*

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**(\*Electronic ) Signature of the Reporting Officer**

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**Date**

\*In the event that an electronic signature is not available, please print this page, sign it, and append a scanned version.

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**(\*Electronic ) Signature of the Reporting Officer  
(where applicant holds a joint appointment)**

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**Date**

\*In the event that an electronic signature is not available, please print this page, sign it, and append a scanned version.



Send the applicant's disclosure (part 1) and your assessment (part 2) ***(preferably with an electronic signature and the file electronically enabled)*** to the VP (RI) (where applicable), or to the Dean.

**\*Note:** Part 2 is protected once electronically signed.

To edit the document once signed, remove e-signature, edit, and re-sign to finalize.

**PART 3: REVIEW BY VICE-PRINCIPAL (R&I)**

**NOTE:** *Part 3 must only be completed in the event that the declaration is related to or has implications for research activities at the University. Where that is not the case, this section need not be completed and the report can be sent directly to the Reporting Officer to complete Part 3.*

**NAME:** \_\_\_\_\_

**POSITION:** \_\_\_\_\_

**COMMENTS**

\_\_\_\_\_  
**(\*Electronic ) Signature of the VP (RI)**

\_\_\_\_\_  
**Date**

\*In the event that an electronic signature is not available, please print this page, sign it, and append a scanned version.

➔ Once reviewed, either: (a) return to the applicant if any additional information or corrections are required to the disclosure report or (b) submit the applicant's disclosure (part 1), the Reporting Officer's assessment (part 2) and the VP(RI)'s assessment (part 3) (***preferably with an electronic signature and the file electronically enabled***) to the Dean.

**\*Note:** Part 3 is protected once electronically signed.  
To edit the document once signed, remove e-signature, edit, and re-sign to finalize.

## PART 4: REVIEW BY DEAN

**Note:** *As Dean it is your duty to evaluate with diligence this declaration of actual or potential COI. Once you have done so, please sign this assessment, preferably with an electronic signature, and forward the finalized copy to the Provost.*

*Should you require support, please contact the Associate Provost (Equity & Academic Policies).*

**NAME:** \_\_\_\_\_

**POSITION:** \_\_\_\_\_

**FACULTY:** \_\_\_\_\_

<b>1</b>	Do you agree with the Reporting Officer's assessment as to the existence of a COI?	YES	NO	N/A
<b>2</b>	Do you agree that the applicant be permitted to engage in the COI?	YES	NO	N/A
<b>3</b>	Will the University be adversely affected by permitting this COI?	YES	NO	N/A
<b>4</b>	Will the University benefit by permitting this COI?	YES	NO	N/A
<b>5</b>	Is the process for monitoring the COI adequate?	YES	NO	N/A
<b>6</b>	Is the period for which permission is granted for the applicant to engage in this COI reasonable?	YES	NO	N/A
<b>7</b>	Are the conditions under which the COI is permitted satisfactory?	YES	NO	N/A

**If you have answered "NO" to any of questions 1, 2, 4, 5, 6, or 7, or "YES" to question 3, please provide reasons:**

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**(\*Electronic ) Signature of the Dean**

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**Date**

\*In the event that an electronic signature is not available, please print this page, sign it, and append a scanned version.

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**(\*Electronic ) Signature of the Dean (where  
applicant holds a joint appointment in more  
than one Faculty)**

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**Date**

\*In the event that an electronic signature is not available, please print this page, sign it, and append a scanned version.



Send a copy of all completed parts of the form (***preferably with an electronic signature and the file electronically enabled***) to the Provost & VP (Academic)

**\*Note:**

Part 4 is protected once electronically signed.

To edit the document once signed, remove e-signature, edit, and re-sign to finalize.

**PART 5: REVIEW BY PROVOST & VP (ACADEMIC)****NAME:** \_\_\_\_\_**POSITION:** \_\_\_\_\_**COMMENTS**\_\_\_\_\_  
**(\*Electronic ) Signature of the Provost & VP (Academic)**\_\_\_\_\_  
**Date**

**\*Note:** Once approved by the Provost and VP(Academic), all parts of the finalized form will be sent to the applicant copied to the Reporting Officer, Dean and, where the declaration has research implications, the VP (RI).



## APPENDIX A

### Elements of a Complete COI Report

Adapted from: *Guidance for Development of Financial Conflict of Interest (FCOI) Management Plan* (Office of Sponsored Research)

This Appendix outlines the information that may be included in a COI declaration and management plan.

#### 1. Purpose

Explain the COI and how the management plan will safeguard objectivity in the research project

#### 2. Role and principal duties of the conflicted Investigator in the research project

Explain principal duties of the applicant in the research project.

#### 3. Conditions and restrictions

Explain conditions or restrictions that might be imposed to manage, reduce, or eliminate the COI. Examples include:

- Disclosure of the COI to the other research project participants;
- Public disclosure of the COI (e.g., when presenting or publishing research);
- Request review of the research protocol by independent reviewers
- Appointment of an independent monitor capable of taking measures to protect the design, conduct and reporting of the research against bias resulting from the COI
- Modification of the research plan (this might require the sponsoring agency's approval);
- Change of personnel or personnel responsibilities, or disqualification of personnel from participation in all or a portion of the research;
- Reduction or elimination of the financial interest (e.g. sale of an equity interest);
- Severance of relationship(s) that create the COI.

#### 4. Notification of students, co-investigators, and other personnel

Describe how persons affected by the COI (students, co-investigators, research staff or other employees, external sponsors of research) have been notified about the FOI. A sample letter for graduate students is available [here](#) and can be adapted for other actors as required.

#### 5. Protection of Students and Other Personnel

Confirm that the COI will not restrict the ability of students and staff to generate, receive, analyze, interpret, or publish data. Further confirm that students will not participate in research associated with the COI if the terms and conditions of participation would prevent or inhibit them from meeting applicable McGill University degree requirements, such as completion, defense of thesis or dissertation, and its publication online under McGill e-Thesis archive (<https://www.mcgill.ca/gps/thesis/final-e-thesis>). It may be possible to temporarily withhold thesis publication by following instructions in this link: <https://www.mcgill.ca/gps/thesis/guidelines/final-submission>.

Confirm that a co-supervisor has been put in place to safeguard the interests of a student who works (with or without pay) for the external entity associated with the COI.

The applicant may supervise technicians, visiting scientists, and postdoctoral fellows who also work in or for the identified entity associated with the COI but such individuals must receive notification, in accordance with Section 4 above, and must further acknowledge having received such notification

**6. Publications and Presentations of Research Related to the Identified Entity**

Explain whether the COI will restrict publication or presentation of McGill University research. Publication may be delayed for the purpose of pre-publication review for a period consistent with McGill University policies. Potential delays should be documented in COI management plans.

**7. Invention Disclosure and Protection of Intellectual Property.**

Confirm review by McGill's Innovation & Partnerships office, specifically, to ensure that all intellectual property generated using McGill University funds, including contracts, grants, and gifts, is governed by McGill's Policy on Inventions and Software and Policy on Copyright.

Further that the applicant has read and will adhere to all Policies, Regulations and Guidelines in research, as documented in: <http://www.mcgill.ca/research/researchers/policies>.

**8. Purchases and Expenditures**

Confirm that the applicant will not be directly involved in decisions about the purchase of items from an external entity associated with the COI using funding under his/her control. Such contractual arrangements must be delegated to an impartial party, who is not under the applicant's supervision or control, such as the Department Chair or someone designated by the Chair.

**9. Annual Review and Monitoring**

Confirm that the applicant will meet annually with the Reporting Officer to review information contained in this report, including compliance with the COI management plan, any new changes to the plan required and any new facts related to the COI. This assessment must be documented and form part of the annual reporting requirement for COIs.

## APPENDIX B

### Extract from the Regulation on Conflict of Interest

*Revised:*  
Senate  
Board of Governors

September 22, 2011  
September 27, 2011

Minute IIB7  
Minute 6

### 1.9 “Reporting Officer” means:

- (i) for the Principal, the Chair of the Board of Governors;
- (ii) for the Provost, Deputy-Provost or a vice-principal, the Principal;
- (iii) for an assistant or associate provost, the Provost;
- (iv) for an assistant or associate vice-principal, that vice-principal to whom the Member reports;
- (v) for the Director or Dean of Libraries, the Provost;
- (vi) for a dean, the Provost;
- (vii) for the Secretary-General, the Principal;
- (viii) for an assistant or associate dean, the dean;
- (ix) for the chair of a department or director of a centre, institute or school, the dean;
- (x) for the director of an administrative unit, the Provost, Deputy-Provost or vice- principal responsible for that unit;
- (xi) for a Member of the academic staff of a faculty having departments, centres, institutes or schools, the chair of the department or the director of the centre, institute or school to which the member has been appointed in his or her official letter of appointment;
- (xii) for a Member of the academic staff of a faculty without departments, centres, institutes or schools, the dean of the faculty to which the member has been appointed in his or her official letter of appointment;
- (xiii) for a Member of the librarian staff, the Director or Dean of Libraries;
- (xiv) for a postdoctoral fellow, the supervisor of the postdoctoral fellow;
- (xv) for a graduate student, the student's supervisor;
- (xvi) for any other Member, the holder of the office to whom the Member reports or who has supervisory responsibility over the Member;
- (xvii) for a Member of a committee other than a committee of the Board of Governors, the chair of the committee;
- (xviii) for the chair of a committee other than a committee of the Board of Governors, the individual or the chair of the body to which the committee reports;
- (xix) in the event that a Reporting Officer is also implicated in the Conflict of Interest situation, the first Reporting Officer's Superior not so implicated.