

## GENERAL INFORMATION

As part of a public institution, McGill community members are required to conduct their activities in a way that withstands 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 **conflict of interest** (COI) related to research activities may arise when a reasonable person might perceive that a Member's actual *or potential* research-related 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 duties.

Please read the [Regulation on Conflict of Interest](#) and the [Recognizing Conflict of Interest document](#). These sources will illuminate the types of situations that might constitute COIs and which ought to be declared here. If you have any questions, please contact the [Compliance Officer \(Research and Innovation\)](#).

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

- undisclosed; or
- 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 to section 3 of the Regulation, which must be reviewed by:

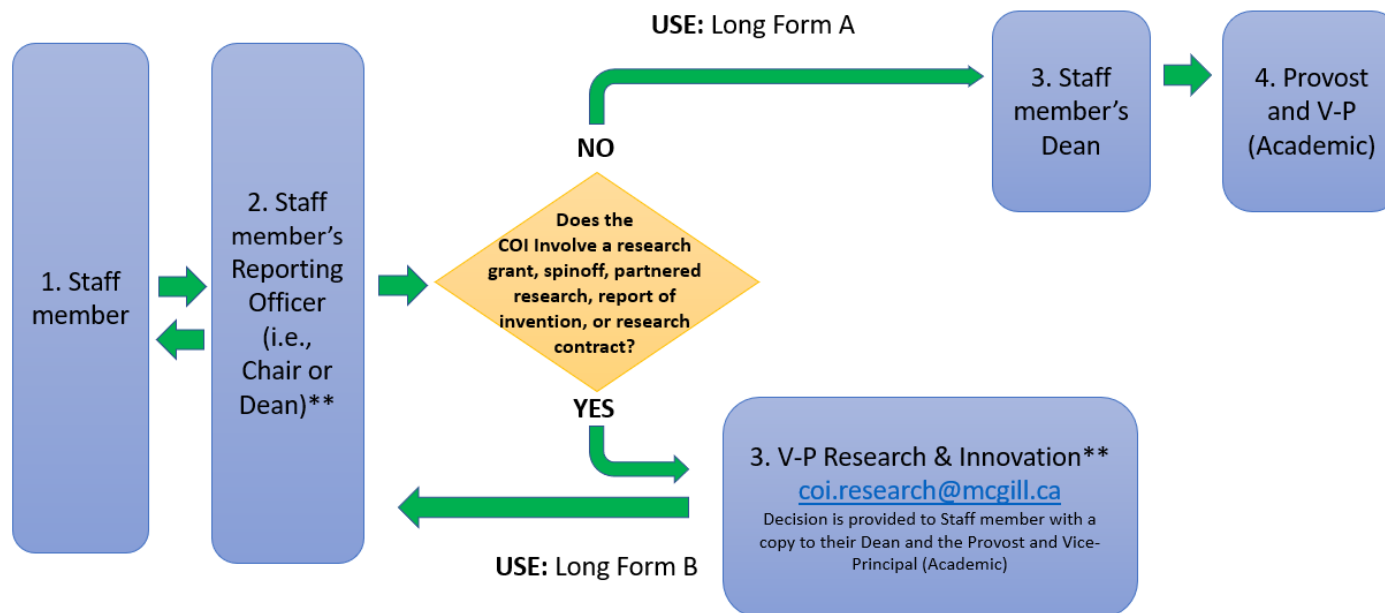
- the Member's Reporting Officer (the Chair or Director, in most instances); and
- the Vice-President (Research & Innovation);

who then informs the Member's Reporting Officer Superior (in most cases the Faculty Dean) and the Provost and Executive Vice-President (Academic).

All of the foregoing is set out in the 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 in cases involving research, reflect the potential requirement for multiple updates and exchanges, depending on complexity of the case.

**THIS COI REPORTING FORM IS DIVIDED INTO 3 PARTS:****PART 1: Member's Disclosure**

Completion of this form is **mandatory** if you indicated an actual or potential research-related 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.

Once you have completed and signed this report, 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 B at the end of this document or s.1.10 of the Regulation.

**PART 2: Review by the Reporting Officer [see Appendix B]**

It is incumbent on the member's direct reporting officer (the Chair or 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 Compliance Officer (Research & Innovation) at [coi.research@mcgill.ca](mailto:coi.research@mcgill.ca);

The Reporting Officer should not sign off on this report until they are satisfied 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 Compliance Officer (Research & Innovation) 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-President (Research and Innovation)**

**STAFF MEMBER INFORMATION****NAME:****RANK/POSITION TITLE:****DEPARTMENT:**

This disclosure relates to:

Annual Disclosure Statement

Date:

Revised/Updated Disclosure Statement

Date:

Funded Application (if applicable)

Date:

Deadline for signature of the agreement

Date

Title and Funding Source (if applicable)

## **PART 1: MEMBER'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.
- Consulting activities are not a COI and need not be disclosed unless such activities involve:
  - McGill students or trainees;
  - use of McGill resources;
  - work for a Related Party; or
  - work for a third party with whom the University has a research contract and under which the member is a part of the research team.

Members will, however, be required to report on consulting activities on their annual activity reports submitted to their chairs or directors (or to their deans, in the case of Faculties without departments).

- 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. The conflicts of interest declared should refer to the past calendar year, and describe the timeline for their occurrence, which may extend into the future for certain situations. Explain.

**2. RELATED PARTIES**

List persons, including “related parties” involved in the COI described in question 1:

**3. AFFECTED PARTIES**

Teaching and supervision are at the core of 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 Member’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 may/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, etc.)
- 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](#)).

**4. PARTIES TO BE INFORMED**

List all persons (including research subjects, students, trainees, co-investigators, co-supervisors, 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:

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

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

NOTE: All Members 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 Member's Reporting Officer, and/or Vice-President (Research & Innovation).

## **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 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.**

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

**Date**

Send your finalized disclosure (with an electronic signature and the file electronically enabled) 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.

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\* Should you experience difficulties with the electronic signature, please contact [coi.research@mcgill.ca](mailto:coi.research@mcgill.ca) for assistance.



## PART 2: REPORTING OFFICER'S ASSESSMENT

**Note:** As a Reporting Officer, it is your duty to evaluate with diligence this declaration of an actual or potential COI. Once you have done so, please sign this assessment with an electronic signature, and forward the finalized copy of the electronically fillable version to the Vice-President (Research and Innovation). Should you require support, please contact the Compliance Officer (R & I) at [coi.research@mcgill.ca](mailto:coi.research@mcgill.ca).

**REPORTING OFFICER'S NAME:**

**RO'S RANK/POSITION:**

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

1. In your assessment of the information provided, is there an **actual** conflict of interest?

**OR**

YES    NO

In your assessment of the information provided, is there a **potential** conflict of interest?

YES    NO

2. Are there any persons, in addition to those identified, who should be made aware of the COI? List additional persons.

YES    NO

3. In your assessment of the situation, will the University be adversely affected by permitting this COI? Explain.

YES    NO

4. In your assessment of the situation, will the University benefit by permitting this COI? Explain

YES NO

5. In your judgement, should the Member be permitted to engage in the COI? Explain.

YES NO

6. Please specify the period for which permission should be granted for the Member to engage in this COI. Specify period.

7. How will you monitor the COI? List details.

## 8. Conditions under which the conflict is to be permitted:

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

Specify:

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

Send the Member's disclosure (part 1) and your assessment (part 2), with an electronic signature and the file electronically enabled to the VP(RI).

**\*Note:** Part 2 is protected once electronically signed.  
To edit the document once signed, remove e-signature, edit, and re-sign to finalize.

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\* Should you experience difficulties with the e-signature, please contact [coi.research@mcgill.ca](mailto:coi.research@mcgill.ca) for assistance.

## PART 3: REVIEW BY VICE-PRESIDENT (R&I)

### PART 3: REVIEW BY VICE-PRESIDENT (R&I)

**NAME:**

**POSITION:**

*Comments:*

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

**Date**

Once reviewed, either: (a) return to the Member if any additional information or corrections are required to the disclosure report, or (b) submit the Member's disclosure (part 1), the Reporting Officer's assessment (part 2) and the VP(RI)'s assessment (part 3), 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.

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\* Should you experience difficulties with the electronic signature, please contact [coi.research@mcgill.ca](mailto:coi.research@mcgill.ca) for assistance.

## APPENDIX A

### Elements of a Complete COI Report

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 Member in the research project

Explain principal duties of the Member 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:

- Appointment of a non-conflicted co-supervisor for the students involved;
- Disclosure of the COI to the other research project team members and 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;
- Describe how persons affected by the COI (students, co-investigators, co-supervisors, research staff or other employees, external sponsors of research, etc.) have been notified about the COI. A sample letter for graduate students is available [here](#) and can be adapted for other actors as required.

#### 4. 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 and 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/final-thesis-submission>

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

#### 5. 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.

#### 6. 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 Member has read and will adhere to all Policies, Regulations and Guidelines in research, as documented in:

[www.mcgill.ca/research/researchers/policies](http://www.mcgill.ca/research/researchers/policies).

#### 7. Purchases and Expenditures

Confirm that the Member 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 Member's supervision or control, such as the Department Chair or someone designated by the Chair.

#### 8. Annual Review and Monitoring

Confirm that the Member 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

REGULATION NAME	REGULATION ON CONFLICT OF INTEREST
<b>Approving Body</b>	Senate Board of Governors
<b>Initial Approval Date</b>	Senate: May 20, 2009 Board of Governors: June 15, 2009
<b>Date of last review</b>	Senate: January 14, 2024 Board of Governors: February 8, 2024
<b>Date of next review</b>	Winter 2029
<b>Executive Sponsor</b>	Provost and Executive Vice-President (Academic)

1.10 **“Reporting Officer”** means:

- i. for the President, the Chair of the Board of Governors;
- ii. for the Provost and Executive Vice-President (Academic), Deputy-Provost or a vice-president, the President;
- iii. for an assistant or associate provost, the Provost and Executive Vice-President (Academic);
- iv. for an assistant or associate vice-president, that vice-president to whom the Member reports;
- v. for the Director or Dean of Libraries, the Provost and Executive Vice-President (Academic);
- vi. for a dean, the Provost and Executive Vice-President (Academic);
- vii. for the Secretary-General, the President;
- 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 and Executive Vice-President (Academic), Deputy-Provost or vice-president 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 their 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 their 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.