



Guidelines for disclosing a Conflict of Interest when graduate students or postdoctoral trainees are involved

Preamble: The [Regulation on Conflict of Interest](#) applies to graduate and postdoctoral trainees as well as supervisors. Trainees may be in conflict of interest if they own, are a part owner or are a senior executive of a company or enterprise. In this case they must report on how they will mitigate the impact of their extra-curricular business activity on their academic progress. If a McGill supervisor is engaged in or is a senior executive of a company or enterprise, the supervisor must indicate to their trainees how they will make certain that the academic progress of their trainees is not hampered by the supervisor's non-academic activity with a company. Additional information on conflicts of interest can be found [here](#).

A. Steps involved in the identification, reporting and mitigation of a Conflict of Interest:

1. Review the [Regulation on Conflict of Interest](#) and follow the reporting schedule:

Step 1 – [Disclosure](#) to the appropriate Reporting Officer. For trainees that is their supervisor. For supervisors that is their Chair. The names of the people involved in the conflict and the mitigation strategy must be defined in detail on the COI disclosure form.

Step 2 – Reporting Officer reviews the COI form and makes recommendations

Step 3 – The COI is reviewed by the Dean of the Faculty

Step 4 – The COI is reviewed by the Vice-Principal (Research and Innovation)

Step 5 – The COI is reviewed by the Provost and Vice-Principal (Academic)

Scenario 1: The supervisor is in conflict and trainees are involved. In this case, the supervisor must:

- 1) Identify the trainees projected to be involved and identify a mitigation strategy specific to each trainee who is impacted.
- 2) Engage a co-supervisor for each trainee to oversee their academic progress.
- 3) Write a letter to each trainee involved to notify them of the COI, to inform them of the name of the new co-supervisor and outline how the supervisor will mitigate the impact of the COI on the trainee's academic progress. Each trainee must be provided with an individual letter. A sample letter is available from APO:
http://mcgill.ca/apo/files/apo/sample_coi_letter-supervisor_to_student_20200228.docx.
- 4) Copy the letter to the Dean of Graduate and Postdoctoral Studies; Associate Dean (Graduate Studies) of the Faculty; Chair of the department; and the Graduate Program Director.

Scenario 2: The trainee is in conflict and the supervisor is impacted. In this case, the trainee must:

- 1) Identify how the COI will impact their academic progress.
- 2) Write a letter to their supervisor outlining how they will mitigate the COI impact such that their academic progress is not affected. All work done for a non-academic purpose should comply with the [Guideline on Hours of Work for graduate trainees](#) or as indicated in the [Letter of Agreement for Postdoctoral Education](#).

B. COI and mitigation strategy review

The impact on academic progress and effectiveness of the mitigation strategy are subject to regular review by the parties involved (for instance, when the enterprise expands or changes scope, or when the implementation of the mitigation strategy reveals an impact to the trainee or the supervisor). At a minimum, the COI and mitigation letter should be reviewed annually as part of the Progress Tracking meeting for graduate trainees and as part of any Letter of Agreement change for postdoctoral trainees.