**Student Innovation and Research Award (SIRA) Committee**

**POLICY ON CONFLICT OF INTEREST**

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# 1. PREAMBLE

To maintain trust and confidence among the student body at Dalhousie Medical School, the SIRA committee must act in accordance with its mission of serving members of the Dalhousie Medical Students’ Society through the provision of non-RIM-related research funding in an equitable and just due process. Within our community, conflicts of interest may arise. The purpose of this policy is to establish a mechanism for identifying and addressing potential and actual conflicts of interest, so that the committee’s constituents can be confident that its decisions are independent of personal interests.

Each member of the SIRA committee has an ethical responsibility to ensure that decisions that affect the SIRA committee and those it serves are taken in the best interests of the collective student body and are not influenced by personal interests.

In this context, “personal interests” is defined as the personal, private, or financial interests of any Dalhousie medical student, including (but not limited to) closely associated person(s) or related business(es). A “closely associated person” is defined as a person related by blood, adoption, marriage, or common-law marriage to the SIRA Committee member or a person with whom an SIRA committee member has an extenuating personal relationship.

This policy aims to minimize the occurrence of conflicts of interest and to manage them when they do arise. It does not necessarily prohibit activities which involve a conflict of interest but rather mandates full disclosure and attempts to ensure that a person with a conflict of interest does not decide whether the conflict of interest will be permitted to continue. The policy has three components:

## 1.1 Recognition

Conflicts of interest must be identified in order to guide their appropriate management. A conflict of interest arises from a particular situation and does not reflect upon the character of the individuals involved.

## 1.2 Disclosure

Conflicts of interest and potential conflicts of interest shall be disclosed in accordance with this policy. In addition, any committee member of the SIRA who is aware or has reasonable grounds to believe that an undisclosed conflict of interest exists is required to report it.

## 1.3 Resolution

Conflicts of interest shall be resolved within a framework and with a procedure which attempts to ensure that the best interests of the community and the committee’s capacity to fulfill its mission are protected.

# 2. DEFINITION OF CONFLICT OF INTEREST

A conflict of interest exists where there is a potential or actual divergence between the personal interests of an SIRA committee member and that member’s obligation to uphold the interests and mission of the committee. In a conflict of interest situation, an impartial observer might reasonably question whether actions or decisions taken by the committee member on behalf of the SIRA committee are influenced by consideration of personal interests**.**

Conflict of interest situations take many forms. Examples include, but are not limited to, cases in which a committee member:

* conducts an assessment of a research project of a close colleague, the outcome of which may affect the committee member’s personal interests.
* conducts an assessment of a research project of a family member, the outcome of which may affect the committee member’s personal interests.
* conducts an assessment of a research project of a student with whom the committee member has an extenuating personal relationship, the outcome of which may affect the committee member’s personal interests.
* conducts or participates in a research project which is being put forward for assessment by the committee.
* uses information acquired in the course of committee activities, which is not in the public domain, to advance their personal or financial research-related interests.

In these examples, the personal interests of the committee member may diverge or may reasonably be perceived to diverge from his or her obligations to uphold the committee’s mission and interests.

# 3. OTHER DEFINITIONS

Within this policy, the following terms shall be interpreted as follows:

1. “business” is defined as any corporation, partnership, sole proprietorship, firm, franchise, association, organization, holding company, joint stock company, business or real estate trust or society, or any other separate legal entity organized for profit or charitable purposes;
2. “financial interest” is defined as an interest in a business consisting of (a) any stock, stock option or similar ownership interest but excluding any interest arising solely by reason of investment in such business by a mutual fund, pension fund, or other institutional investment fund over which the committee member does not exercise control; or (b) receipt of, or the right or expectation to receive, any income or benefit from such business whether in the form of a fee (e.g. consulting), business, salary, allowance, forbearance, forgiveness, interest in real or personal property, dividend, royalty derived from the licensing of technology, rent, capital gain, real or personal property, or any other form of compensation, or any combination of the foregoing;
3. “personal interests” is defined as the personal, private, or financial interest of a committee member or closely associated person or related business;
4. “closely associated person” is defined as a person related by blood, adoption, marriage, or common-law marriage to the committee member or a person with whom a committee member has an extenuating personal relationship;
5. “related business” is defined as a business or society in which the committee member or any closely associated person:
   * + 1. has a financial interest;
       2. acts as a trustee, director or officer;
       3. acts in a position as an employee, agent or otherwise which includes responsibility for a segment of the operation or management of a business; or
       4. acts in a position as an employee, agent or otherwise which includes responsibilities for influencing or determining the scientific direction of the corporation.
6. “committee member” is defined as all representatives on the Student Research and Innovation Award committee involved in the decision-making process pertaining to allocation of funds for non-RIM-related research initiatives among Dalhousie medical students.

# 4. POLICY

A committee member shall not participate in an activity or decision that involves an actual or potential conflict of interest unless such activity or decision has been approved by the committee and, if such approval has been given, any terms or conditions regarding such activity or decision are fulfilled.

# 5. PROCEDURES

## 5.1 Disclosure

A committee member shall disclose to their fellow committee members any personal interests which are, or may reasonably be perceived to be, in conflict with the committee member’s obligation to uphold the SIRA committee’s mission and interests. Disclosure shall be made in each of the following circumstances:

* + as soon as any situation arises which creates, or has the potential to create, a conflict of interest for a committee member;
  + when requested in writing by the Chair of the SIRA Committee, or designated substitute, in advance of the committee meeting.

Normally, a disclosure of a conflict of interest shall be made in ad lib at the beginning of each quarterly meeting or in advance to the Chair of the SIRA Committee, in writing. **For any given round of applications, a maximum of two committee members may submit their research initiatives for consideration by the board.** This quota will be filled based on a first-come-first-serve basis and will be monitored by the Chair of the SIRA committee.

If a committee member is uncertain whether a conflict of interest exists or is likely to exist, he or she shall discuss the situation with the Chair of the SIRA committee.

**When a committee member discloses a potential conflict of interest, they shall have the option of excusing themselves from the remainder of the meeting**. In the event that the committee member believes that their judgement may not be impaired by the potential conflict, the affected member will be asked to briefly vacate the physical or virtual meeting space during a discussion on the member’s conflict of interest among remaining committee members. Once a consensus has been reached, the alleged committee member will either be told to remain outside of the immediate vicinity of the meeting space or be invited back to attend the rest of the meeting in their full capacity.

Any person who is aware or has reasonable grounds to believe that an undisclosed conflict of interest exists shall raise the matter with the committee member involved in the potential conflict and refer them to this Policy.If the person reasonably believes that this Policy is not being followed by the committee member after the issue has been raised with them, or that raising the issue with the committee member is inappropriate in the circumstances, they shallreport it to the Chair of the SIRA Committee, where otherwise required in accordance with this policy. The representative of the DMSS shall discuss the alleged undisclosed conflict of interest with the committee member and, if a conflict of interest exists, shall deal with it in accordance with this policy.

## 5.2 Procedures for Handling General Conflicts of Interest

When a conflict of interest is disclosed by a committee member, the SIRA committee shall decide whether a conflict of interest exists, whether this conflict has the potential to impair the judgement of the alleged committee member, and if so, what the appropriate course of action should be to equitably assess candidates for funding allocation for that round of applications.

**Normally, the committee member with the alleged conflict of interest shall abstain from relevant voting decisions and may be asked to leave the immediate vicinity of the physical or virtual meeting space pending the judgement of the committee.** The SIRA committee shall base their determination of the appropriate course of action in the spirit of the best interests of the Dalhousie Medical School student body and the capacity of the SIRA committee to fulfill its mission.

After each funding cycle, the Chair of the SIRA committee shall present a report of funding decisions at the DMSS executive meeting consisting of the President, VP Medical Education, VP External, VP Internal, VP New Brunswick, VP Communications, VP Finance, and Past President for review of a summary of the decisions taken with respect to conflicts of interest, together with any recommendations for policy changes.

Any proposed changes in this policy must be considered by the DMSS executive for approval before change is enacted at the next quarterly meeting.

## 5.3 Use of Information for Personal Gain

A committee member shall not use information (including, but not limited to, information about the faculty’s students, personnel, finances, contractual arrangements and plans) acquired as a result of committee-related activities to advance their personal interest, unless the information is in the public domain.

**6. IMPLEMENTATION**

The SIRA committee may develop guidelines to assist in the administration of this policy.

# 7. COMPLIANCE

The intent of this policy is to assist the SIRA committee in the management of conflict of interest situations before they arise or when they become known. The DMSS expects that the members of the SIRA committee will comply fully with this policy, including all requirements for disclosure. Failure to do so shall constitute grounds for disciplinary action in accordance with any applicable collective agreement, Code of Student Conduct, or other applicable disciplinary process.

# 8. APPEALS

Any committee member who is not satisfied with a decision relating to them under this policy may appeal the decision within **seven** days of the quarterly meeting in which a conflict of interest arose. The committee member shall submit a written statement outlining the grounds of appeal and the reasons therefor, together with any relevant documentation, to the DMSS executive. If the DMSS executive reasonably believes that the members of the SIRA committee might otherwise be biased in considering the appeal, the SIRA committee will host a repeat quarterly meeting in the presence of an appointed Dalhousie faculty representative to oversee the fair and equitable assessment of research initiatives in consideration of funding allocation for that cycle. The DMSS executive must reach an agreement within seven days of receiving the appeal, although any executive member of the DMSS may extend that time upon giving notice to the appealing committee member if reasonable depending on circumstantial factors.An appeal decision shall be in writing and shall be binding on the committee member.

# GOVERNING POLICY

This policy functions in accordance with and is governed by the Dalhousie University Policy on Conflict of Interest.