

POLICY AND PROCEDURE MANUAL

Policy Title:	CONFLICT OF INTEREST IN RESEARCH POLICY	Area of Responsibility: VICE PRESIDENT, ACADEMIC
Policy Section:	APPLIED RESEARCH	
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10.2 CONFLICT OF INTEREST IN RESEARCH

Introduction

This policy is to apply to all St. Clair College employees, students and contractors involved in research, as well as any other individuals or organizations involved directly or indirectly with research at the College including but not limited to , officials representing the College, visiting faculty, members of advisory boards, industry partners, research trainees, or interns.

Purpose

The primary purpose of this policy is to establish a code of conduct to ensure and maintain the integrity of research at St. Clair College.

All St. Clair College staff will be made aware of this policy and it will be posted on the St. Clair College’s Intranet, College Policy, and Procedures, Section 10, Applied Research.

St. Clair College staff must make all reasonable efforts to ensure non-employees involved in research at the College are aware of, and comply with this policy.

This policy is not meant to supersede the existing policy 5.4, “Code of Conduct and Conflict of Interest”. This policy will serve to further define roles and accountabilities as they pertain to research activities.

Policy Statements

1. Conflict of Interest occurs when an individual or organization has a real, potential or perceived direct, or indirect personal interest which competes with St. Clair College’s research interests.
2. Research personnel participating on a project with an industry client must not have a financial stake with that client.

3. Those involved in research at St. Clair College must not seek to use their position to benefit themselves, their friends or family, in any business transaction or personal activity, at the expense of the College, and must not put, or seem to put, the College under any obligation not authorized by the College via the Senior Operating Group.
4. An employee may not engage in private work or business that is likely to interfere with that person's ability to perform his or her duties and responsibilities for the College.
5. The College Applied Research and Development department will be responsible for tracking all funded and unfunded applied research activities at the College.
6. The College Applied Research and Development department will also be responsible for providing administrative support for research contracts and funds.
7. Conflict of Interest under this policy shall be interpreted broadly.

Policy Principles

- **Ethical Standards**

All St. Clair College personnel involved in research, as well as any other individuals or organizations involved directly or indirectly with research at the College, will act with honesty and uphold the highest ethical standards in order to enhance public confidence in the College's ability to act in the public's best interest and for the long term good of the public, including faculty, staff, students, the community, industry partners and institutional partners.

- **Public Scrutiny**

All St. Clair College personnel involved in research, as well as any other individuals or organizations involved directly or indirectly with research at the College will perform their official duties and arrange their private affairs in a manner that will bear the closest public scrutiny, an obligation that is not necessarily fully discharged by simply acting within the law.

- **Decision Making**

In fulfilling their duties and responsibilities, all St. Clair College personnel involved in research, as well as any other individuals or organizations involved directly or indirectly with research at the College will make decisions in the interest of St. Clair College, with a view to public interest, and with regard to the merits of each case.

- **Private Interests**

All St. Clair College personnel involved in research, as well as any other individuals or organizations involved directly or indirectly with research at the College will disclose fully any private interests that could be affected by St. Clair College actions or that could put ethical practice or the perception of ethical practice at risk.

- **Public Interest**

All St. Clair College personnel involved in research, as well as any other individuals or organizations involved directly or indirectly with research at the College will arrange their private affairs in a manner that will prevent real, potential, or apparent conflicts of interest from arising; but if such a conflict does arise between the private interests of an individual and the official duties and responsibilities of that individual, the conflict shall be disclosed and resolved in favor of St. Clair College, and the public.

- **Gifts and Benefits**

All St. Clair College personnel involved in research, as well as any other individuals or organizations involved directly or indirectly with research at the College are not to solicit or accept transfer of economic benefit other than incidental gifts, customary hospitality or other benefits with St. Clair College, unless the transfer is pursuant to the enforceable contract.

- **Preferential Treatment**

All St. Clair College personnel involved in research, as well as any other individuals or organizations involved directly or indirectly with research at the College will not step out of their official roles to assist private entities or persons in their dealings with St. Clair College where this would result in preferential treatment to any person or organization.

- **Insider Information**

All St. Clair College personnel involved in research, as well as any other individuals or organizations involved directly or indirectly with research at the College will not knowingly take advantage of, or benefit from, material information that is not generally available to the public that is obtained in the course of their official duties and responsibilities.

Procedures

- **Disclosure**

Disclosure of a perceived, potential or actual conflict of interest must take place as soon as the individual becomes aware of the conflict. The conflict must be reported to the Chair of the appropriate school and the Director, Applied Research and Development. All conflict incidents will be disclosed to the College's Senior Operation Group. Any conflict of interest must be disclosed and resolved prior to the expenditure of any related research funds.

- **Notice**

A disclosed conflict of interest must be recorded in writing and kept on file in the College's Applied Research Office. In the case that the matter disclosed is of a confidential or sensitive nature the Director, Applied Research and Development will determine whether the matter must be fully disclosed for the good of the College. The Director, Applied Research and Development will give the disclosing individual the opportunity to make full disclosure. If the individual does not do so, he or she will be considered in breach of this policy.

- **College Applied Research and Development department**

The College Applied Research Office is responsible for informing in writing, the relevant funding agency of any conflict of interest which may affect a decision about a specific application or request for a grant.

- **Final Determination**

In the case that the individual and the Director, Applied Research and Development cannot reach an agreement on resolving the conflict of interest, the matter will be escalated to Senior Operating Group for resolution. Any conflict of interest will be resolved in favor of St. Clair College.

- **Remedy**

Where a disclosed interest is deemed unacceptable by the Director, Applied Research and Development or the Senior Operating Group, the research contract, project or the offending provisions will be terminated.

- **Consequences**

Failure to comply with this policy may lead to progressive disciplinary measures or in egregious cases, termination. Legal action may be taken against an individual or organization where failure to comply with this policy results in loss or damage to the College.