

Title	CONFLICT OF INTEREST IN RESEARCH		
Classification	Administrative	Oversight Responsibility	Office of Vice-President, Research and International
Category	Research	Responsible Office	Research and Innovation
Approval	Board of Governors	Effective Date	2022-Jun-16
		Document No.	1050

This policy is applied in a manner consistent with applicable statutory and legal obligations, including university collective agreements and terms of employment.

The most up-to-date versions of the university's policies are posted on the policy and procedure website. If you've printed this policy, check the website to ensure you have the current version.

NOTE: The first appearance of terms in **bold** in this document (except titles) are defined terms – refer to the Definitions section.

PURPOSE

The purpose of this policy is to:

- define what constitutes a real, perceived, or potential conflict of interest in research; and
- provide a framework to identify, minimize, and manage situations pertaining to a conflict of interest in research in a timely, fair, transparent, and consistent manner.

POLICY STATEMENT

Royal Roads University (“Royal Roads” or “university”) research seeks to contribute to positive change in individuals’ lives, communities and societies. Our research is intentionally designed to directly benefit the communities in which we live, work and play, be they local, national, or international. Royal Roads research aims to inspire action and address real-world challenges such as those in education, technology, information, the natural world, and social systems as we prepare for a disruptive future. As such, Royal Roads recognises the possibility for real, perceived, or potential conflicts of interest in research to occur during the course of research activities. In many situations, conflicts of interest in research can be managed. However, left undisclosed and unmanaged, such conflicts threaten the integrity and reputation of the university.

COMPLIANCE

Compliance with this policy extends to all **university members**, their **closely associated persons**, and the university itself, and applies to all **research** related activities conducted under the auspices of the university whether the research is sponsored by the university, by an external funder, or by a university member.

PROVISIONS

1. General

- 1.1 A conflict of interest in research exists where a university member, or the university itself, may give preference, or be perceived to give preference, to their own interests or obligations over research-related duties and responsibilities. Conflicts of interest may be real, perceived, or

potential and involve personal interests (including that of a related business), or financial interests. Examples of a conflict of interest in research are set out in the related procedure.

2. University Member Responsibility

- 2.1. University members assess their own research-related activities prior to the activity taking place and immediately disclose any real, perceived, or potential conflict of interest in research as defined by this policy and in accordance with the accompanying procedures.
- 2.2. Where a real, perceived, or potential conflict arises subsequent to the onset of research activity, disclosure must be made as soon as the conflict is identified.
- 2.3. Lack of awareness of this policy and related procedures does not mitigate Royal Roads' response to a failure to disclose a real, perceived, or potential conflict of interest in research.

3. Conflict Review and Assessment

- 3.1 Conflicts of interest in research are reviewed in a timely, fair, transparent, and consistent manner in accordance with the related procedures.
- 3.2. Following an assessment, a determination is made whether to manage or prohibit the conflict of interest in research position as follows:
 - a) managed conflicts are required to set out the requirements to manage the conflict and continue the research in a manner that protects and serves the integrity, legal and contractual obligations, reputation, and interests of the university, the researcher, and in cases where the research is co-developed, the community in which the research takes place (e.g. Indigenous communities); and
 - b) prohibited conflicts are required to set out the reason for the prohibition and may also include requirements to remove or mitigate the conflict position to continue the research.

4. Non-compliance

- 4.1 Non-compliance constitutes misconduct and may be pursued under related university policies and procedures.
- 4.2 The university reserves the right to recover any profit or financial benefit achieved by a university member as a result of non-compliance with this policy or the review and assessment requirements.

AUTHORITIES, ROLES, AND RESPONSIBILITIES

Members of the university community are responsible for supporting the consistent and transparent management of conflicts of interest in research.

1. Board of Governors/Program and Research Council

- 1.1. The Board is responsible for the oversight of areas related to institutional risk and the reputation of the university, of which this policy refers.
- 1.2. The Program and Research Council is responsible for reviewing and recommending improvements to the university's overall approach to conflict of interest in research and ensuring that research activities comply with legal and policy requirements.

2. Academic Council
 - 2.1 Academic Council is responsible for and has and oversight of academic quality assurance at the university.
3. Vice-President Research and International
Administration of the conflict of interest in research policy and processes are delegated to the Vice-President Research and International who will:
 - 3.1 arrange for reviews of the conflict of interest in research policy as appropriate; and
 - 3.2 coordinate conflict of interest in research procedures.
4. The Office of Research Services is responsible for coordinating and maintaining good conflict of interest in research practices.
5. University members are responsible for the areas identified in s.2 of this policy.

DEFINITIONS

For the purposes of this policy:

Closely associated persons means a person related to the university member by blood, adoption, marriage or common-law, or with whom a university member has a close personal, financial, or business relationship; it may also include an individual with whom a university member has previously had such a relationship.

Financial interest means the receipt or expectation of anything of monetary value, including pay or payments for services (e.g., consulting fees, bonuses, speaker's fees, advisory board remuneration, finders or recruitment fees, or honoraria), equity interests (e.g., stocks, stock options), security or other ownership interests, and intellectual property rights (e.g., patents, copyrights, royalties or carried interests or options related to such rights).

Personal interest means the personal, private, or financial interest of a university member or closely associated person or related business.

Related business means a business or society in which the university member or any closely associated person:

- a) has a financial interest;
- b) acts as a trustee, director or officer;
- c) 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
- d) acts in a position as an employee, agent or otherwise which includes responsibilities for influencing or determining the scientific direction of the corporation.

Research means a systematic inquiry for the purpose of gaining new knowledge or new understanding or new application. For the purposes of this policy, research includes all activities and products related to the research and may be generated as part of a research grant, a research contract, a self-funded project, an institutional based consulting contract, an institutional service contract relating to academic matters or any other institutionally based contract other than direct instructional contracts, as well as student research as part of academic programs (e.g., theses, organizational consulting projects, major projects, class assignments, papers, reports, internships, etc.).

University member(s) means a Royal Roads full-time, part-time, and casual employee or contractor, which includes, but is not limited to faculty and associate faculty, a university graduate and undergraduate student, other non-degree student, university post-doctoral fellows, research assistants, visiting workers, visiting professors, adjunct professors, members of the Board of Governors and those otherwise affiliated with or representing the university (e.g., any staff or directors of university-affiliated research centres, entities or facilities either wholly or partly owned or controlled by Royal Roads). In the case of research co-developed and co-led with communities, community members who are involved in conducting the research shall also be considered university members for the purposes of this policy on conflict of interest in research (e.g. research with Indigenous communities).

RELATED DOCUMENTS

Royal Roads University documents and information:

- Academic Integrity and Misconduct in Research and Scholarship (policy and procedure)
- Conflict of Interest (policy)
- Conflict of Interest in Research (procedure)
- Intellectual Property (policy and procedure)
- Research Ethics (policy)
- Standards of Conduct and Service (policy)
- Safe Disclosure (policy)
- Collective Agreements <https://humanresources.royalroads.ca/collective-agreements>

Review and Revision History

Approved by Board of Governors	2009-Jul-09
Revised and approved by Board of Governors	2021-Oct-07
Transfer to updated template; no content change	2021-Nov-22
Revised and approved by Board of Governors	2022-Jun-16
Next review	