

## George Brown College Research and Innovation Policies Conflict of Interest in Research

### 1. PURPOSE AND APPLICATION

---

This policy is an addendum to George Brown College's Conflict of Interest Policy created by the Human Resources office and issued on November 10, 2006.

- 1.1 This policy applies to all George Brown College personnel 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 professors, members of advisory boards, industry partners, and students and research trainees.
- 1.2 The purpose of this policy is to establish a code of conduct to ensure and maintain the integrity of research at George Brown College.

### 2. DISSEMINATION OF POLICY

---

- 2.1 All George Brown College staff will be made aware of this policy and it will be posted on the college's intranet.
- 2.2 George Brown 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.

### 3. GENERAL PRINCIPLES

---

- 3.1 **Conflict of Interest** Conflict of Interest occurs when an individual or organization has a real, potential or perceived direct or indirect personal interest which competes with George Brown College's research interests.
- 3.2 **Obligation** Those involved in research at George Brown 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.
- 3.3 **Duty** 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.
- 3.4 **Administration** The college's Research and Innovation office will be responsible for tracking all funded and unfunded applied research activities at the college, via its research database and other systems. The Research and Innovation

office will also be responsible for providing administrative support for research contracts and funds.

**3.5 Interpretation** Conflict under this policy shall be interpreted broadly.

**3.6** All individuals and organizations involved in research at George Brown College shall:

**3.6.1 Ethical Standards**

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 staff, students, the community, industry partners and institutional partners.

**3.6.2 Public Scrutiny**

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.

**3.6.3 Decision Making**

In fulfilling their duties and responsibilities, make decisions in the interest of George Brown College, with a view to public interest, and with regard to the merits of each case.

**3.6.4 Private Interests**

Disclose fully any private interests that could be affected by George Brown College actions or that could put ethical practice at risk.

**3.6.5 Public Interest**

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 favour of George Brown College, and the public.

**3.6.6 Gifts and Benefits**

Not solicit or accept transfer of economic benefit other than incidental gifts, customary hospitality, or other benefits of nominal value from persons, groups or organizations having, or likely to have, dealings with George Brown College, unless the transfer is pursuant to an enforceable contract.

**3.6.7 Preferential Treatment**

Not step out of their official roles to assist private entities or persons in their dealings with George Brown College where this would result in preferential treatment to any person or organization.

### **3.6.8 Insider Information**

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.

## **4. PROCEDURES**

---

- 4.1 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 a manager within the college's Research and Innovation office (Director, Industry Liaison Manager, Project Managers or Operations Manager). Any conflict of interest must be disclosed and dealt with before the expenditure of any related research funds.
- 4.2.1 Notice** A disclosed conflict of interest must be recorded in writing and kept on file in the Research and Innovation office. In the case that the matter disclosed is of a confidential or sensitive nature the Director of Research and Innovation will determine whether the matter must be fully disclosed for the good of the college. The Director 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.
- 4.2.2** The Research and Innovation 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.
- 4.3 Final Determination** In the case that the individual and the Director of Research and Innovation cannot reach an agreement on dealing with the conflict of interest, the matter will be escalated to the Vice President Academic. Any conflict of interest will be resolved in favour of George Brown College.
- 4.4 Remedy** Where a disclosed interest is deemed unacceptable by the Director of Research and Innovation or the Vice President Academic the research contract or project, or the offending provisions, will be terminated.

## **5. CONSEQUENCES**

---

Failure to comply with this policy may lead to progressive disciplinary measures. In the most serious case this could include removal from the position the individual holds at George Brown College. 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.