

## **Faculty of Health Sciences**

# **Policy on Conflict of Interest In Interactions With Industry**

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## **Faculty of Health Sciences Policy on Conflict of Interest In Interactions with Industry**

### **Preamble**

The Faculty of Health Sciences (FHS) at Queen's University is committed to the improvement of the health and well-being of our population, to the advancement of health sciences through research and the education of exceptional health sciences professionals. In the past, this mission has been enhanced by effective interaction with Industry. The intent of the Policy is to ensure that this mutually beneficial interaction continues in a manner that is compatible with currently accepted academic, professional and industry principles. Recognizing that there are many positive outcomes resulting from academic and industrial collaboration, including, but not limited to: new drugs, devices, procedures and career opportunities, this document establishes the FHS's policy that governs interactions between all FHS members and Industry.

Interactions with Industry occur in a variety of contexts, including marketing of new pharmaceutical products, medical or rehabilitation devices and/or equipment; on-site training for newly purchased devices; educational support of health sciences, medical, rehabilitation and nursing learners, and continuing professional development/continuing health professionals' education; in research activities; and in commercialization opportunities. FHS members may also participate in interactions with Industry off campus and in scholarly publications. In all cases, the interaction with Industry must be ethical, transparent and avoid any real, potential or perceived conflicts of interest that may jeopardize the integrity of the Faculty's education, training, and research, or the reputation of either the FHS member or Queen's University. Although certain interactions may have a real, potential or perceived conflict of interest, this does not necessarily preclude the interaction from occurring, providing that it is openly declared and appropriately managed. Failure to declare and appropriately manage is a problem.

## **Purpose**

The purpose of the Policy is to delineate the FHS position on real, perceived or potential conflicts of interest with Industry and to provide processes and mechanisms to address them. The intent is that all parties can be confident that all members of the FHS act with integrity, adhere to the highest ethical standards and that their decisions and actions are not inappropriately influenced by personal interest. No member of the FHS shall engage in activities that may create the potential for a conflict of interest, as defined in the Policy unless the activity has been disclosed and permission to proceed has been obtained from the person with the appropriate authority to grant such approval under the Policy. The Policy is intended to be consistent with and complementary to other policies and collective agreements that govern the conduct of the members of the FHS at Queen's University. (See Appendix of relevant policies.)

## **Scope**

The Policy applies to all members of the FHS at Queen's University. When in affiliated institutions, all Faculty of Health Sciences members will abide by the relevant guidelines of that institution or, where no such guidelines apply, by the standards set out in this document. Where two guidelines exist, it is required that faculty and learners will abide by the more rigorous of the two.

If there is a conflict between the Policy and provisions of a collective agreement with regard to a faculty or staff member to whom the collective agreement applies, the collective agreement will prevail.

Further note that it is possible for a faculty or staff member to be in compliance with all relevant University policies and collective agreements on matters of conflict of interest, and yet to not be in compliance with the conflict of interest guidelines of the granting agency where the activity in question relates to funds from a granting agency. It is recommended that Principle Investigators who are holders of a grant(s) review the COI policies of the granting agency to ensure compliance.

Industry representatives are also expected to be familiar with the Policy and shall adhere to its principles.

The Policy covers the following types of interactions:

1. Promoting Partnerships
2. Gifts to Individuals
3. Pharmaceutical Samples and Medical, Rehabilitative or Nursing Supplies
4. Site Access by Pharmaceutical Representatives
5. Site Access by Device Manufacturer and Hospital/Research Representatives
6. Research and Professional Development Events
7. Industry Funding for Education: Undergraduate, Graduate and Postgraduate Programs
8. Participation in Industry-Sponsored Meetings and Other Events
9. Industry-Sponsored Scholarship and Other Educational Funds for Learners
10. Industry Sponsored Research
11. Meals
12. Professional Travel
13. Ghostwriting
14. Purchasing
15. Consulting Relationships
16. Educational Materials
17. Philanthropic Gifts
18. Commercialization Opportunities

### **Definition**

Conflict of Interest (COI): A conflict of interest may be real, potential, or perceived. It occurs when a financial or personal interest of a FHS member or his/her immediate family member, may compromise, or have the potential to compromise, or create the perception of compromising, the individual's professional judgment or integrity and independence in clinical responsibilities, teaching, conducting or reporting research, or performing other obligations as required by their employment agreement.

## **Specific Policies and Practices**

**1. Promoting Partnerships** – The Faculty of Health Sciences at Queen’s University believes that it is desirable to promote mutually beneficial relationships with industry. The potential for positive outcomes resulting from academic and industrial collaboration is recognized as an important pursuit. Partnerships will be sought and developed following principles that recognize the existence of potential conflicts of interest, whether they be real or perceived, and in the framework of a transparent process that mitigates negative consequences of such conflict of interest.

**2. Gifts to individuals** – Members of the FHS should avoid accepting personal gifts of any significant monetary or other value from industry. Gift refers to items of any value for which the recipient neither pays nor provides services. This includes, but is not limited to, items such as textbooks, electronic media, gift certificates, tickets, devices, products or services, travel, hotel accommodations, entertainment or payments for attending a meeting. Physicians, Nurses, Occupational Therapists, Physical Therapists, other regulated professionals, and learners should be aware that acceptance of gifts of any value has been shown to have the potential to influence clinical decision-making.<sup>1</sup> If a FHS member has any doubts about the propriety of accepting a particular gift, they should discuss the matter with the person to whom they report.

Institutional gifts including, but not limited to, donations, grants, in-kind support, and other materials may be accepted by the Faculty, its Offices, Schools, Departments, Divisions and Research Institutes provided appropriate documentation and public disclosure occurs.

**3. Pharmaceutical Samples and Medical, Rehabilitative or Nursing Supplies** – Pharmaceutical samples may be of benefit to patients who might not otherwise be able to afford a needed medication. They may also be provided for research purposes or therapeutic trials. For these reasons, such samples are acceptable, but only if they are not given directly to a clinician or trainee. This may be achieved by an arms length

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<sup>1</sup> Marco, C.A., Moskop, J.C., Solomon, R.C., Geiderman, J.M. & Larkin, G.L. (2006).

Gifts to Physicians from the Pharmaceutical Industry: An Ethical Analysis. *Annals of Emergency Medicine*, 48(5), 513-521.

arrangement with an individual in a clinician's office or a centrally managed system. The clinic note should document the use of free samples and the reason for their use. Medical, rehabilitative and nursing supplies may also be acquired for the above-identified uses as well as for educational purposes. This guideline applies equally to these situations.

**4. Site Access by Pharmaceutical Representatives** – Access by sales or marketing pharmaceutical representatives to an individual clinician or groups of clinicians is by appointment or by invitation and only in an area where or when patients are not present. Any involvement of learners in such activities must be under the supervision of a faculty member and approached as an educational opportunity. In contrast to this, pharmaceutical/industry representatives engaged in audits, mentoring or research, or their agents, may attend meetings in the hospital, clinic or on campus in keeping with the terms of their research contracts.

**5. Site Access by Device Manufacturer and Hospital/Research Representatives**  
Access by device manufacturer and hospital/research representatives to a clinician or researcher, or groups of clinicians or researchers, within a clinical learning environment is subject to the policy of the host institution. Industry representatives will meet with members of the FHS by appointment or by invitation only and normally not in-patient care areas. The exception to access to patient care areas may occur to provide in-service training on devices and other equipment and then only by appointment and with prior disclosure and signed consent by the patient or substitute decision maker. Any involvement of learners in such activities must be under the supervision of a faculty member and approached as an educational opportunity.

**6. Research and Professional Development Events**

**a) Continuing Health Professions Education** – The support of continuing professional development for health professions education (including but not restricted to courses, conferences, workshops, Faculty-approved rounds, internet courses and the production of learning resources) by Industry is subject to the existing Office of Continuing Professional Development (CPD) policy (Appendix – Relevant Policies). All programs offered/endorsed by the FHS are subject to audit to ensure compliance with the standards for accreditation of CPD/CME and must meet said standards. The program planners or the committee members must define and approve the content of

all educational activities. Industry sponsors of educational programs may not determine the content or selection of speakers for educational programs and must not be members of the content planning committee. Industry may direct their funds to support educational programs regarding a particular therapy or disease entity.

Commercial exhibits intended to showcase Industry products are permitted on FHS premises if they are directly related to an educational activity, and must comply with the Office of CPD policy. The location of commercial exhibits should be in an area outside of that used for the educational activities. Industry representatives may be permitted to demonstrate products/devices as part of education programs when deemed appropriate by the program committee organizing the event.

- b) **Other Conferences, Meetings or Activities** - FHS members may attend programs and events offered by professional organizations or associations, universities, or regulatory bodies that receive educational grants or sponsorship from Industry. Participation in these professional activities is not within the purview of the Office of Continuing Professional Development, but is subject to the Policy, as discussed in item #7 below.

**7. Industry Funding for Education: Undergraduate, Graduate and Postgraduate Programs** – All faculty members have an obligation to disclose activities that a reasonably informed objective observer would believe conflict with his or her primary responsibilities to the education of learners. All FHS members must disclose any perceived, potential or real conflicts of interest relevant to topic when teaching, presenting or participating in administrative functions or meetings in the course of their duties in education. Disclosure to learners shall require inclusion of a statement in the written presentation materials outlining the name of the industry partners, and a brief description of the nature of the relationship between the faculty member and the industry partner. The absence of any conflict of interest should also be disclosed to learners in the faculty member's written presentation materials. In certain situations, the COI may preclude involvement of the faculty member in particular educational activities. Real or potential or perceived conflicts of interest that must be disclosed in an educational activity include:

- a) Assigning or providing educational material to students when the material is authored by the faculty member and provided for the purposes of marketing a product or service;

- b) Assigning or providing educational material to students where the material is authored by a member of faculty and the assignment will result in personal gain;
- c) Having a financial, personal or pecuniary interest in a therapy or service which is taught, presented or recommended in the course of teaching, including clinical teaching and/or presentation

All funding accepted from Industry or third parties for educational programming must be free of actual or perceived conflict of interest and must be provided in the form of an educational grant. Funds for educational activities may be provided to the FHS or to a Department, Division or Program but must not be given to an individual faculty member, staff or learner. Industry sponsors of educational programs may not determine the structure, content, delivery method or selection of speakers for educational programs nor participation in such decisions. Education grants may cover expenses including, but not limited to, venue costs, modest food and beverages that are determined by the Department, Division or Program to be important for the program. Industry funds for education may come as a gift through Advancement in which case there will be an established donation agreement. Industry sponsorship of journal clubs must follow the general guidelines of accredited CPD/CME events (see link in the Appendix) and there must be no overt or covert advertising or marketing taking place during this activity. Education of the learners with respect to appropriate interactions with Industry is essential. Curricula should include formal education regarding the ethical guidelines for the relationship and interactions of clinicians and researchers with Industry. Generic names of agents and devices should be used during instruction.

#### **8. Participation in Industry-Sponsored Meetings and Other Events -**

Faculty members who speak, moderate, or participate in the organization or delivery of Industry-sponsored meetings or activities must abide by the following requirements:

- a) All financial or 'in kind' support received during the previous two (2) years must be fully disclosed to participants;
- b) The speaker(s) must provide a fair and balanced discussion of the current science and treatment options;
- c) The speaker(s) must make clear that the comments and content reflect the individual views of the speaker(s) and not the FHS;

- d) Compensation is limited to reimbursement of reasonable travel expenses and an honorarium appropriate for the defined service.
- e) The speaker must disclose, to the audience, if any off label indications are discussed.

**9. Industry-Sponsored Scholarships and other educational funds for trainees –**

Sponsored scholarships and other educational funds such as Fellowships are a welcome way for Industry to support education. The funds must be provided to support the student in meeting their academic requirements. Such donations must be made centrally to the administration of the educational unit or the School, Department, Division or Program and it must be clear that there is no quid pro quo (a favour for a favour), expectation or commitment. Selection of recipients of such support will be done without industry involvement. Direct use of Industry funds to a specific individual in which the Industry can be identified, and is used to support trainees/students to attend conferences or off-campus courses, is not acceptable.

**10. Industry-Sponsored Research** - A prerequisite for the participation of FHS members in any industry sponsored research activity is that said research be conducted according to the Queen's University Policy on Integrity in Research.

- a) All FHS members who participate in the design, conduct or reporting of Industry-funded or Industry co-sponsored research which is based in the FHS shall ensure that the budget includes all applicable overhead costs and that there is a signed multi-partnered agreement that is satisfactory to the researcher, the Director of the School, the Director of the National Cancer Institute of Canada (NCIC) Clinical Trials Group (CTG) or the Head of the Department (in which the researcher holds his/her primary appointment), the Industry partner, Queen's University signing authority, and affiliated institutions if applicable. In the case of research conducted at affiliated institutions, research projects involving Industry must also comply with the policies and procedures of the affiliated institution. These policies and procedures must be agreed to by the FHS and the delegated Queen's University representative, as well as the affiliated institution, in keeping with established affiliation agreements. The health sciences research ethics board (HSREB) or the general research ethics board (GREB) must approve those research projects involving the participation of human subjects or the use of their personal and/or health information. Clinical trials in cancer require approval at the Ontario Cancer Research Ethics Board in addition

to HSERB approval. The University Animal Care Committee (UACC) must approve those research projects involving the use of animals in research, teaching, or testing at Queen's.

- b)** Research grants from, or contracts with Industry, should be carried out independently and objectively for the purposes of the advancement of scientific knowledge or clinical efficacy. It is part of Queen's function and policies to disseminate information and to make it available for the purpose of scholarship. It is further recognized that the publication of certain technical information may compromise its commercial value. FHS members shall not enter into research agreements with industry that indefinitely restrict the FHS member's right to publish or disclose results of the study or report adverse events that occur during the course of the study. In the event a graduate student of Queen's works on an industry-funded research project, the student and Industry partner must follow the standards established in the Queen's University agreement and template.
  - c)** Because of the potential to influence judgment, remuneration for participating in Industry-funded research studies, including clinical research studies, may only cover reasonable time and expenses and should be disclosed to the HSREB or GREB for studies involving the participation of human subjects or the use of their data. Remuneration should be disclosed as a potential or perceived conflict of interest.
  - d)** All research funding received from Industry will be administered through an account at the University. Statements disclosing all expenditure, transfers and transactions from Industry sponsored research accounts will be provided for audit as required.
- 11. Meals** – FHS members should not accept food or meals at an educational event within the FHS or off-site, unless attending an approved CPD/CME event. An approved event is one that has received CPD/CME accreditation or is compliant with sections 6-8.
- 12. Professional Travel** – Funding from Industry for travel for FHS members is acceptable only for legitimate reimbursement or for contractual services.
- 13. Ghostwriting** – Ghostwriting is understood to occur when a paid professional writer writes something credited to someone else. All FHS members must be responsible for the content of any publication, presentation or slides presented in their name. Under no circumstances will members of the FHS be listed as authors/co-authors on presentations

of any kind, oral or written, in which their inferred contribution has been entirely prepared by a ghostwriter.

**14. Purchasing** – Decisions relating to the purchasing of equipment and services must be free of bias. If FHS members, or their immediate family members, have financial interests in the pharmaceutical, devices, equipment industry, medical supply or providers of services, they must declare this interest and excuse themselves from decisions related to any purchases related to these conflicting interests. In situations in which a person's expertise is needed to evaluate a product or service and in which that person has any ties, this must be declared to those responsible for making the final decision. In keeping with provincial procurement policies, Queen's University has established a policy regarding purchasing. All purchasing done in the FHS must comply with the Policy.

**15. Consulting Relationships** – FHS members have special knowledge and competencies they may wish to share with Industry. Consulting contracts performed using University resources may only be entered into after discussion and contract review by/with the designated approval authority as outlined in relevant University agreements (QUFA Collective Agreement) and/or policies (University Senate Conflict of Interest and Commitment). Such contracts must provide details of specific tasks and deliverables. Consulting arrangements, using university resources, that pay faculty without clearly defined associated duties are considered gifts and are prohibited.

**16. Educational Materials** – Faculty members may wish to enter into agreements with Industry to develop educational materials. The content of any materials must be in keeping with the principle outlined above in that the interactions result in optimal benefit to clinical care, education and research, and maintenance of the public trust. If the work can be classified as a 'major paid professional activity' then the FHS must be involved in negotiations. Any income accruing from the content, organization, and the medium for delivery of all educational material produced by faculty members must be established by a tripartite agreement involving the faculty member(s), Industry partner and the FHS. No contract will be negotiated that would interfere with the right of any FHS student to complete their educational program.

**17. Philanthropic Gifts** – Gifts of a philanthropic nature from Industry or a third party to a School, Department, Division, or faculty member are welcome and gratefully received. All such gifts must be made through the FHS Advancement office or an affiliated hospital.

**18. Commercialization Opportunities** – The fundamental stance of the FHS is to encourage the transfer of research and educational innovation into products that will benefit the public. These developments have the potential to be of financial benefit to the University, affiliated institutions, the faculty member(s) and Industry.

If an Inventor wishes to pursue commercialization, he or she shall disclose the Invention and the names of all co-Inventors to the Office of the Vice-Principal (Research) as soon as practicable. Disclosure shall be on the PARTEQ “Invention Disclosure Form” or such other form prescribed by the Office of the Vice-Principal (Research).

## **Procedural Guideline for Reporting Conflicts of Interest**

1. In addition to reporting requirements contained in other University policies, a FHS member has an obligation to disclose, as soon as she or he could reasonably be aware that a potential conflict exists, all actual or potential conflicts of interest and/or commitment to the person to whom she or he reports.
2. If the person to whom the faculty member reports have an interest in the matter to be discussed, the disclosure should be made to the person at the next higher level of authority (usually the Dean, Vice-Principal, or the Principal).
3. The person to whom the faculty member reports, in consultation with the faculty member and others, where appropriate, will determine whether a conflict exists.
4. In the event that there is an actual or potential conflict, the person to whom the faculty member reports and the member will agree on a course of action to resolve the conflict, and the agreement will be in writing.
5. In the event that a member of the FHS believes that there is a conflict of interest that has not been declared, the matter should first be discussed with the person believed to be in conflict or to the person to whom they report.

In the event that agreement cannot be reached, the case will be referred to the next higher level of authority for resolution, up to and including the Dean, the appropriate Vice-Principal, or the Principal.

## Glossary

**Aesculapian Society:** A society in which every medical student at Queen's University is considered an active member. According to the society, it is "dedicated to the promotion of the general interests of the School of Medicine and to the control of matters affecting medical students in their relationships to one another, to other student organizations at Queen's and elsewhere, and to the School of Medicine, [Senate](#), and other [governing bodies](#) of Queen's University." [http://www.qmed.ca/as\\_council](http://www.qmed.ca/as_council)

**Commercialization:** the process or cycle of introducing a new product or production method into the market. In the context of the Policy, commercialization is the transfer of research and educational innovation into products that will benefit the public.

**Conflict of Interest (COI):** A conflict of interest may be real, potential, or perceived. It occurs when a financial or personal interest of a FHS member or his/her immediate family member, may compromise, or have the potential to compromise, or create the perception of compromising, the individual's professional judgment or integrity and independence in clinical responsibilities, teaching, conducting or reporting research, or performing other obligations as required by their employment agreement.

**Continuing Professional Development/ Continuing Health Professions Education:** A program focused on continuing the education and learning of health professionals to promote evidence-informed, cost-effective, patient centered health care. The program at Queen's University offers courses and resources to health professionals in many disciplines.

**Devices:** Physical or tangible items that can be produced, bought, and sold. In the context of the Policy, devices specifically refer to items that are used for health care purposes or other purposes related to the work of FHS members.

**Faculty of Health Sciences (FHS):** The Faculty of Health Sciences at Queen's University encompasses the School of Medicine, School of Nursing, and School of Rehabilitation Therapy. The FHS is responsible for both the undergraduate, and post-graduate Medical programs, the Life Sciences and Biochemistry undergraduate and graduate programs, the undergraduate and graduate Nursing programs and the graduate Rehabilitation programs.  
[http://healthsci.queensu.ca/home/general\\_information](http://healthsci.queensu.ca/home/general_information)

**FHS Member:** any person-faculty, staff, or student learner-who is a part of the Faculty of Health Sciences at Queen's University.

**General Research Ethics Board (GREB):** The institutional review board to which each protocol involving human subject must be submitted to ensure that it complies with the ethical principles set out by the institution. The GREB at Queen's University is responsible for all research not falling under the HSREB's jurisdiction (i.e. non-FHS related research).  
<http://www.queensu.ca/ors/researchethics/GeneralREB.html>

**Ghostwriting:** Ghostwriting occurs when a paid professional writer writes something credited to someone else.

**Gift of Significant Value:** A gift of significant value refers to a gift (see above) that has a large enough value to be considered significant, and may be deemed so by a member of the FHS or other onlookers. A strict numerical value is not assigned to this term, thus judgment of the gift recipient must be utilized to determine the significance of the gift. If the gift recipient is uncertain about the significance of the gift, consulting with the person to whom they report is recommended.

**Gifts:** Gift refers to items of any value for which the recipient neither pays nor provides services. This includes, but is not limited to, items such as textbooks, electronic media, gift certificates, tickets, devices, products or services, travel, hotel accommodations, entertainment or payments for attending a meeting.

**Granting Agency:** In the context of the Policy, a granting agency refers to any government (federal, provincial, or municipal), foundation, or not-for-profit organization providing either monetary or in-kind support for a project.

**Health Sciences Research Ethics Board (HSREB):** The institutional review board to which each protocol involving human subject must be submitted to ensure that it complies with the ethical principles set out by the institution. The HSREB is responsible for all research conducted through the FHS and Affiliated Teaching Hospitals.  
<http://www.queensu.ca/ors/researchethics/REB.html>

**Immediate Family:** Immediate family refers to a person's spouse, domestic partner, children, parents, siblings, or equivalents by marriage.

**Industry:** the broad group of profit-making enterprises that manufacture products, devices, and services for commercial value. Specifically, industry includes, but is not limited to, companies, stakeholders, interest groups, and other profit making enterprises. In the context of health sciences, industry may include, for example, pharmaceutical companies, educational product developers, device manufacturers, and innovative designers.

**In-Kind Support:** In-kind support refers to non-cash support in the form of goods, , and services.

**Major Paid Professional Activity:** In the context of the Policy, a major paid professional activity is the profession or employment situation of an FHS member that provides a significant proportion of their financial income.

**Nursing Science Society:** The Nursing Science Society (N.S.S.) represents all undergraduate Queen's Nursing students to the School of Nursing, the University at large, and the greater Kingston area. Executive members are elected annually from the student population and meet bi-weekly throughout the year to discuss issues of concern to the student body, plan both Nursing-specific and campus-wide events, and maintain communication between all years of Nursing students.

As a society, the N.S.S. aims to facilitate both academic and social interaction among Nursing students, with other disciplines, and between students and faculty members. The N.S.S. also takes an active role in supporting community charity organizations, donating over \$5,000 to a variety of different causes in the 2009-2010 academic year.

Professionally, the N.S.S. directly interacts with the Registered Nurses Association of Ontario Interest Group and the Canadian Nursing Students' Association. The N.S.S. also has representatives on the National Health Sciences Students' Association and local chapter, the Queen's Health Sciences Students' Association. At the university level, N.S.S. representatives sit on a variety of governing bodies and committees including the Alma Mater Society executive, the Nursing Orientation Committee, the School of Nursing Academic Council, Senate, and the Faculty of Health Sciences Faculty Board.

There are many opportunities on the Nursing Science Society through class council, N.S.S. Executive Board and many volunteer opportunities throughout the year.

**Perceived Conflict of Interest:** A perceived conflict of interest occurs when a financial or personal interest of a FHS member or his/her immediate family member creates the perception of compromising the individual's professional judgment or integrity and independence in clinical responsibilities, teaching, conducting or reporting research, or performing other obligations as required by their employment agreement.

**Potential Conflict of Interest:** A potential conflict of interest arises when a financial or personal interest of a FHS member or his/her immediate family member has the potential to compromise, the individual's professional judgment or integrity and independence in clinical responsibilities, teaching, conducting or reporting research, or performing other obligations as required by their employment agreement.

**Principal investigator:** The person involved in a project that is primarily responsible for directing the project, communicating with project members, granting agencies, and other bodies involved in the project.

**Rehabilitation Therapy Society Student Council:** The Rehabilitation Therapy Society Student Council at Queen's University are dedicated and spirited student leaders who operate in a collegial way to uphold and promote the needs of a diverse group of rehabilitation therapy students within a multidisciplinary Faculty of Health Sciences. <http://www.rehabsociety.ca/>

**Research:** A studious investigation or experimentation aimed at the discovery or interpretation of knowledge; the systematic collection or revision of knowledge or accepted theories in the light of new facts, or practical application of such new or revised theories; and the development and application of methodologies to increase knowledge and the practical application of knowledge to specific problems or circumstances."

**Student Learners:** Students--undergraduate, graduate, and post-graduate--who are receiving some form of instruction or teaching from the FHS.

## Appendix

**Queen's University**

**Conflict of Interest Policy**

<http://www.queensu.ca/secretariat/policies/senateandtrustees/conflict.html>

**Queen's University**

**Policy on Integrity in Research**

[http://meds.queensu.ca/assets/regionaled/Research\\_Integrity\\_Policy.pdf](http://meds.queensu.ca/assets/regionaled/Research_Integrity_Policy.pdf)

**Queen's University**

**Procurement Policy**

[http://queensu.ca/procurement/policies/Procurement\\_Policy\\_March\\_2013.pdf](http://queensu.ca/procurement/policies/Procurement_Policy_March_2013.pdf)

**Queen's University**

**Research Policy**

(still in draft form)

**Queen's University**

**Indirect Costs of Sponsored Research Policy**

(see secretariat website)

**Continuing Professional Development**

**Disclosure of Conflict of Interest Policy**

[http://healthsci.queensu.ca/assets/cpd/pdf/CPD\\_policy\\_on\\_conflict\\_of\\_interest.pdf](http://healthsci.queensu.ca/assets/cpd/pdf/CPD_policy_on_conflict_of_interest.pdf)

**Queen's University Faculty Association**

**Collective Agreement**

<http://www.queensu.ca/provost/faculty/facultyrelations/qufa/collectiveagreement.html>

**Canadian Medical Association**

**Code of Ethics**

<http://policybase.cma.ca/dbtw-wpd/PolicyPDF/PD04-06.pdf>

**Canadian Medical Association**

**Policy for Interactions with Industry**

<http://policybase.cma.ca/dbtw-wpd/Policypdf/PD08-01.pdf>

**Royal College of Physicians and Surgeons of Canada**

**Declaration of Conflict of Interest Form**

[http://www.royalcollege.ca/portal/page/portal/rc/common/documents/cpd\\_accreditation/c oi\\_disclosure\\_form\\_e.pdf](http://www.royalcollege.ca/portal/page/portal/rc/common/documents/cpd_accreditation/c oi_disclosure_form_e.pdf)

**College of Family Physicians of Canada**

**Declaration of Conflict of Interest Form**

[http://www.cfpc.ca/Conflict\\_of\\_Interest\\_Form/](http://www.cfpc.ca/Conflict_of_Interest_Form/)

**The College of Physicians and Surgeons of Ontario  
Conflict of Interest Policy**

<http://www.cpso.on.ca/cpso/media/uploadedfiles/members/elections/conflict-interest-policy.pdf>

**Canadian Physiotherapy Association  
Conflict of Interest Policy**

[http://www.physiotherapy.ca/getmedia/133bfb5b-2327-454d-8db6-cff4123f837f/Conflict-of-Interest\\_en.pdf.aspx](http://www.physiotherapy.ca/getmedia/133bfb5b-2327-454d-8db6-cff4123f837f/Conflict-of-Interest_en.pdf.aspx)

**College of Physiotherapists of Ontario  
Conflict of Interest Policy**

<http://www.collegept.org/Resources/PracticeScenarios/ConflictofInterest1>

**Canadian Nurses Association  
Code of Ethics**

<https://cna-aicc.ca/~media/cna/files/en/codeofethics.pdf>

**College of Nurses of Ontario  
Independent Practice Policy**

[http://www.cno.org/Global/docs/prac/41011\\_fsIndepPrac.pdf](http://www.cno.org/Global/docs/prac/41011_fsIndepPrac.pdf)

**College of Nurses of Ontario  
Professional Conduct and Misconduct Policy**

[http://www.cno.org/Global/docs/ih/42007\\_misconduct.pdf](http://www.cno.org/Global/docs/ih/42007_misconduct.pdf)

**Canadian Association of Occupational Therapists  
Code of Ethics**

<http://www.caot.ca/default.asp?pageid=35>

**College of Occupational Therapists of Ontario  
Standards for the Prevention and Management of Conflict of Interest**

<http://www.coto.org/pdf/standardsforconflictinterest2012.pdf>