

Conflict of Interest Policy

1. PURPOSE

- 1.1 This Policy delineates the roles, responsibilities, and processes for the identification, elimination, minimization, and/or management of perceived, potential, and real Conflicts of Interests for all those involved in any capacity with the New Brunswick Institute for Research, Data and Training (NB-IRDT), in keeping with the principles of *The Tri-Council Policy Statement "Ethical Conduct for Research Involving Humans"* (TCPS2 2014).

2. SCOPE

- 2.1 This Policy applies to the NB-IRDT Director, NB-IRDT employees (as applicable), the NB-IRDT Data and Research Committee, and all others involved with NB-IRDT in any capacity of data access, use, dissemination, retention, or storage.

3. DEFINITIONS

- 3.1 *Conflict(s) of Interest*: A conflict between a person's duties and responsibilities as a NB-IRDT employee or Committee member and that person's professional, business, personal/familial, or public interests. Conflicts of Interest cause divided loyalties and can lead to biased judgment. Conflicts of Interest can be perceived, potential, or real.
- 3.1.1 *Real*: Arises when an outside interest influences a NB-IRDT employee/Committee member's ability to act with objectivity, independence, and integrity.
- 3.1.2 *Potential*: Arises when a NB-IRDT employee/Committee member becomes aware of an outside interest that may influence the member's ability to act with objectivity, independence, and integrity.
- 3.1.3 *Perceived*: Arises when it appears to others that an outside interest would influence a NB-IRDT employee/Committee member's ability to act with objectivity, independence, and integrity.
- 3.2 *Data and Research Committee (DRC)*: Includes representatives from the New Brunswick Executive Council Office, Department of Health, and the provincial Chief Information Access and Privacy Officer, as well as the NB-IRDT Director, the NB-IRDT Project Coordinator, and other NB-IRDT employees as appropriate (e.g., NB-IRDT Senior Data Analyst). The DRC also includes business owners from other public bodies who have provided data to NB-IRDT. The DRC serves four main functions for NB-IRDT; first, the DRC provides a forum to discuss issues relevant to database transfers and data linkage procedures; second, the DRC serves as a forum for consultation on procedural changes; third, to continue to build awareness (at least once per year the DRC organizes a forum to present results of projects to Government of New Brunswick (GNB) and other stakeholders); and fourth, the DRC assembles working groups (DRC-WG) to review and provide feedback on Data Access Applications received from researchers seeking access to administrative data sets held at NB-IRDT, as well as draft reports from these projects. It is through DRC-WG members reporting to their respective departments that relevant stakeholders are informed of the outcomes of a particular

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research topic prior to public dissemination.

- 3.3 *New Brunswick Institute for Research, Data and Training (NB-IRDT)*: A Research Data Centre as defined in New Brunswick legislation with the authority to compile and link Personal Information or Personal Health Information for the purposes of research, analysis or evidence-based decision-making. NB-IRDT is composed of three locations, with the Hub located in Fredericton, and Satellite Sites located in Saint John and Moncton. These secure facilities are situated on the University of New Brunswick (Fredericton) campus (Keirstead Hall, 38 Dineen Drive; Units 316, 317, and 317-A); on the Saint John campus (Hazen Hall, 93-97 Tucker Park Road; Unit 333); and, on the Université de Moncton campus (Bibliothèque Champlain, 415 avenue de l'Université; salle 031).
- 3.3 *Project Data*: Data prepared for a specific project and stored in a project folder, which consists only of information approved for a specific research project.
- 3.4 *Project Data Set(s)*: Sets of data generated by the NB-IRDT Senior Data Analyst who extracts and links approved variables from platforms and external data sets, including public databases (e.g. census profiles, and researcher's own databases), for a specific research project.

4. POLICY STATEMENTS

- 4.1 Conflicts of Interest arise when there is a personal, professional, financial incentive, or any other types of benefits to an individual (or their relatives/friends) resulting from a decision made (or influenced) in their capacity as a Committee member, or when the NB-IRDT Senior Data Analyst is extracting or vetting data for a research project in which they are involved.
- 4.2 Individuals functioning in multiple roles as principle investigator/researcher and Committee member are in a potential Conflict of Interest when;
- they request access to NB-IRDT data for their own research; and/or,
 - they serve in a supervisory or mentoring relationship with a student who is submitting a request for access to NB-IRDT data.
- 4.3 A DRC member may be in a Conflict of Interest when they have interpersonal or financial relationships with the researchers, or personal/financial interests in a company, labour union, or not-for-profit organization that may be the sponsor of the research or that may be substantially affected by the research.
- 4.4 A Conflict of Interest may arise from either a positive or negative previous experience with a researcher that has an impact on the Committee member's ability to be impartial and unbiased in their decision-making.
- 4.5 A Conflict of Interest may be perceived if the NB-IRDT Senior Data Analyst accesses and extracts data for their own research (or that of a family member or friend).
- 4.6 The presence or appearance of a Conflict of Interest may jeopardize the integrity of research and undermine public trust and/or the reputation of an institution if the processes are not

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seen to be fair and transparent.

4.7 The preferred method of dealing with Conflicts of Interest is avoidance of the conflict; however, due to the limited number of candidates qualified to sit as DRC members, it may be necessary to proceed with a conflict situation. In those cases, the DRC Chair and Committee must be confident that a review can be completed in an unbiased manner. In addition, the Committee must ensure that:

- the conflict is minimized to the fullest extent,
- all impacted parties are informed of the conflict; and,
- the conflict is documented in the DRC meeting minutes.

5. PROCEDURES

5.1 *Data Research Committee Members and the Director of NB-IRDT*

- 5.1.1 If a member of the Data Research Committee (DRC) is an applicant on a research proposal, is otherwise aware of, or suspects that they are in an actual, potential, or perceived Conflict of Interest, they must disclose that conflict to the DRC Chair as soon as possible. This disclosure must be made even if there is no intention of acting on the conflict. The DRC Chair will then find another Committee member to serve on the Committee with respect to the matter (e.g. another suitable person from the same business, department, or organization).
- 5.1.2 If the DRC Chair is aware of or suspects that they are in a perceived, potential, or real Conflict of Interest, they must immediately disclose that conflict to the NB-IRDT Director. The NB-IRDT Director will find another Committee member to serve on the Committee with respect to the matter.
- 5.1.3 If the NB-IRDT Director is an applicant on a research proposal, they cannot be a member of the DRC review working group. NB-IRDT will be represented by the Executive Director (or designate) of the Office of Research Services at the University of New Brunswick (UNB).
- 5.1.4 In real or potentially significant Conflict of Interest situations, the affected DRC member must recuse their self and cannot take part in any conflict related decision or vote. The affected DRC member must leave the room while the vote is occurring and must not attempt to influence the outcome in any way. The recusing of the DRC member is to be documented in the minutes.
- 5.1.5 To ensure adequate and continued access to competent expertise, the Committee may seek specific expertise from the affected DRC member if there is no one else available to the Committee; however, the DRC member should not be present when related decisions are being made. This should be fully documented in the meeting

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minutes.

- 5.1.6 Given the fact that the membership of the DRC is small, if there is no other option but to include a member of the DRC who has recently collaborated with, mentored, or acted as a supervisor for a researcher, the conflict is disclosed and written in the meeting minutes and in the decision letter sent to the applicant.

5.2 *NB-IRDT Senior Data Analyst Data Access*

- 5.2.1 In situations where a request for data access has been approved for release and the researcher is the NB-IRDT Senior Data Analyst, or is related to a person in these roles, the NB-IRDT Director will assign a NB-IRDT Data Analyst to review the Project Data extracted prior to the project research commencing.
- 5.2.2 The NB-IRDT Director will contact the NB-IRDT Senior Data Analyst and request that the research Project Data extracted be moved to a working directory that can be accessed by the NB-IRDT Data Analyst assigned to review the Project Data set.
- 5.2.3 The NB-IRDT Data Analyst assigned will review the Project Data set to ensure that only the approved variables are present and in the approved format for that project.
- 5.2.4 If the assigned NB-IRDT Data Analyst determines that the access approval was adhered to, they will notify the NB-IRDT Director and Senior Data Analyst that the data can be moved to a research project folder for their use.
- 5.2.5 If the NB-IRDT Data Analyst determines that the access approval was not adhered to, they will notify the NB-IRDT Director who will investigate the situation.

5.3 *NB-IRDT Senior Data Analyst Aggregate Project Data Release*

- 5.3.1 When the NB-IRDT Senior Data Analyst is ready to request aggregate data be released for a project they will notify the NB-IRDT Director who will request the assigned NB-IRDT Data Analyst to vet the proposed data for release.
- 5.3.2 The NB-IRDT Data Analyst assigned will review the vetting request to ensure that only the approved variables are present and in the approved format for that project.
- 5.3.3 If the assigned NB-IRDT Data Analyst determines that the vetting request meets requirements, they will notify the NB-IRDT Director and Senior Data Analyst that the data can be released.
- 5.3.4 If the NB-IRDT Data Analyst determines that the access approval was not adhered to, they will notify the NB-IRDT Director who will investigate the situation.

6. ADMINISTRATION

6.1 *Accountability*

- 6.1.1 All DRC members and NB-IRDT employees are responsible to disclose any perceived,

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potential, or real Conflicts of Interest as soon as they become aware of them.

6.1.2 The NB-IRDT Director is responsible to ensure that this Policy is followed and that the alternate arrangements are made as required.

6.1.3 In situations where the DRC must proceed even though there is a real or perceived conflict, the DRC Chair is responsible to ensure it is documented in the minutes of meeting, any decisions are written, and all affected parties informed.

6.2 *Monitoring, Auditing and Reporting*

6.2.1 The NB-IRDT Project Coordinator will keep a log of conflicts and will refer to this log when planning the composition of DRC working groups for review meetings.

6.2.2 If it is discovered that a DRC member has not disclosed a conflict that they were aware of, the DRC Chair will review the situation and bring a recommendation to the rest of the Committee regarding whether the member should continue to serve on the Committee and/or if others should be notified.

6.2.3 If an NB-IRDT employee has not disclosed a conflict that they were aware of, the NB-IRDT Director (or, in the event that the Director has not disclosed, the VP (Academic), UNB) will address the matter through the provisions of the applicable UNB Employee Agreement, and appropriate sanctions will be made.

7. RELATED DOCUMENTS

- *NB-IRDT Glossary of Terms and Acronyms*
- *NB-IRDT Data and Research Committee Terms of Reference*
- *NB-IRDT Partnership Coordination Committee Terms of Reference*
- *NB-IRDT Strategic Directions Committee Terms of Reference*

8. REFERENCES

- [*Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans*](#) (TCPS2 2014)

9. DOCUMENT VERSION, REVIEW AND APPROVAL HISTORY

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1.0	NB-IRDT Staff	Document Creation		September 2016
Approved by		Approval Date	Effective Date	Review Date
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2.0	D. Curtis Maillet	Major Revisions for 2018 Expansion	December 2018	
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