

# Policy on Conflicts of Interest in Research

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## **PREAMBLE**

HEC Montréal has a responsibility to fulfil its mission in a manner that preserves the trust of all members of the academic community, granting agencies, and its public and private stakeholders, in a society that is increasingly demanding and conscious of issues of conflict of interest.

Trust is fundamental to the proper functioning of an academic institution. All policies and procedures of HEC Montréal, of the granting agencies and of the regulatory bodies that oversee several of HEC Montréal's activities are founded on the premise that integrity is a quality inherent in all members of the academic community. Given that conflicts of interest can undermine the legitimate trust placed in institutions, steps must be taken to ensure the adequate management of conflicts of interest in research.

## **1. PURPOSE**

- 1.1 The purpose of this Policy is to define the notion of conflicts of interest in research and to propose measures to recognize them and resolve them adequately.

## **2. SCOPE**

- 2.1 This Policy applies to the following persons:
  - 2.1.1 Members of HEC Montréal's faculty and staff
  - 2.1.2 All students taking part in research at HEC Montréal, whether paid or unpaid by HEC Montréal to do so.
- 2.2 This Policy uses the term "researcher" to refer to the categories of persons described in articles 2.1.1 and 2.1.2.

## **3. RECOGNIZING A CONFLICT OF INTEREST**

- 3.1 For the purposes of this Policy, a conflict of interest is a conflict between the duties or responsibilities of a researcher at HEC Montréal and the private, professional or business interests of that same person.
- 3.2 In particular, a conflict of interest arises where a person is in a position to influence research activities in a manner that could further that person's own interests, further the interests of their family members, friends or associates, or grant an undue advantage to another party,

regardless of whether it is detrimental to HEC Montréal or other members of the academic community.

- 3.3 A conflict of interest can be real, potential or perceived. The conflict of interest is real in cases where the situation described in articles 3.1 or 3.2 actually exists. It is potential if such a situation is likely to arise, and it is perceived if an informed and reasonable person is led to conclude that a researcher has put themselves in a conflict of interest situation.

## 4. RESOLVING CONFLICTS OF INTEREST

### a) Recognition by the researcher

- 4.1 A researcher who believes they have put themselves in, or is about to put themselves in, a conflict of interest must disclose this situation:
- 4.1.1 to the chair of HEC Montréal's Research Ethics Board (REB) if their research project is subject to HEC Montréal's research ethics review process
  - 4.1.2 to the Director of Research and Knowledge Transfer in all other cases
- 4.2 This policy uses the expression "responsible person" to refer to all persons described in Articles 4.1.1 and 4.1.2.
- 4.3 The responsible person will, in cooperation with the researcher, determine the measures to be taken to adequately manage the conflict of interest.
- 4.4 The responsible person may conclude that the disclosure alone is sufficient to resolve the conflict of interest, and that no further specific measures are required; the researcher and the responsible person may agree on any reasonable measure in order to adequately resolve the conflict of interest.
- 4.5 The Secretary-General of HEC Montréal keeps a register of declarations of conflict of interest. This register is accessible to the public and, in addition to the declarations of conflict of interest made by researchers, it contains the measures taken to resolve conflicts of interest.
- 4.6 In the event of refusal on the part of the researcher, the chair of the REB of HEC Montréal can recommend that the REB of HEC Montréal either withdraw or refuse to renew a certificate of ethics approval that has already been issued.
- 4.7 In the same circumstances, the Director of Research may conclude that the situation of a conflict of interest is not resolved within the meaning of the *Policy for the Responsible Conduct of Research* and may handle the situation in accordance with Article 3 of that policy.

### b) Recognition by a third party

- 4.8 Any person who believes that a researcher has put themselves in, or is about to put themselves in, a conflict of interest may disclose this situation to the responsible person. This disclosure can also be made anonymously.

- 4.9 The responsible person will conduct an initial inquiry to ensure there is a credible basis for the declaration. The researcher who is the subject of a declaration must be informed of the declaration submitted by a third party.
- 4.10 If the declaration is found to be without a credible basis, the responsible person will notify the third party and close the file.
- 4.11 If the responsible person finds that there is a credible basis for the declaration of the third party, they must handle the conflict of interest situation in accordance with the procedure provided for in the preceding section of Article 4.
- 4.12 The responsible person must, at the request of the third party, take reasonable steps to protect their anonymity.

## **5. CONSERVATION OF DOCUMENTS**

- 5.1 The Director of Research and Knowledge Transfer oversees the preservation of documentation relating to the execution of this policy until it is archived.

## **6. POLICY APPLICATION AND MANAGEMENT**

- 6.1 The Research and Knowledge Transfer Office in HEC Montréal is responsible for the application of this policy and its mandate is to:
- ensure the policy is applied and followed, and take any necessary measures to this end
  - determine the conditions and procedures for the rules set out in this policy
  - assume any other responsibilities in connection with this mandate that the Director of HEC Montréal may entrust to it, including the submission of a report on the application of this policy, or, the revision of its contents.

## **7. EFFECTIVE DATE AND REVIEW**

- 7.1 This policy comes into effect upon its adoption by the Academic Council, on April 25, 2012.
- 7.2 Its most recent update was adopted by the Academic Council on May 25, 2022.
- 7.3 It must be revised when Federal and Quebec funding agencies update their policy on the responsible conduct of research.