

HEC MONTRÉAL

Politique relative aux conflits d'intérêts en recherche

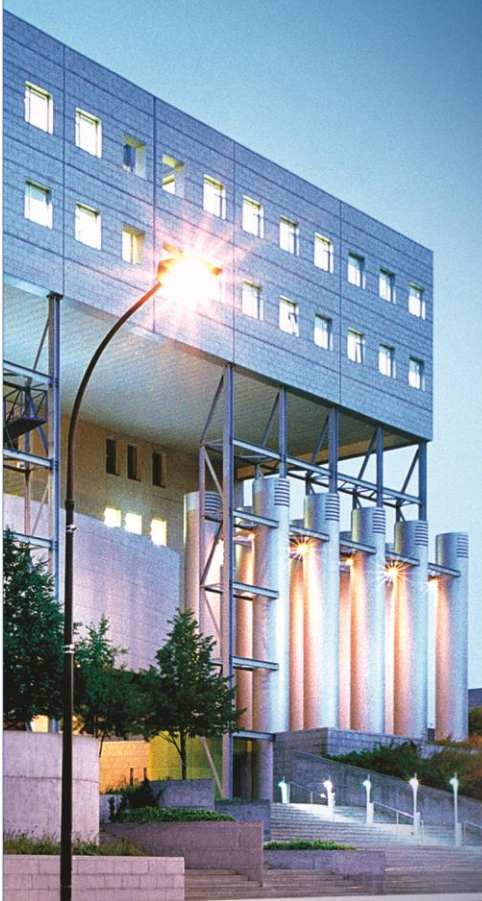
Policy on Conflicts of Interest in Research

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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 the School'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 conflict of interest in research and to propose measures to ensure the adequate management of situations involving a conflict of interest.

2. Scope

- 2.1 This Policy applies to the following persons:
 - 2.1.1 All faculty members and personnel of HEC Montréal;
 - 2.1.2 All students taking part in research at HEC Montréal, whether paid or unpaid.
- 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. Definition of 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 the School or other members of the academic community.

- 3.3 A conflict of interest may 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 him/herself in a conflict of interest situation.

4. Disclosure

a) Disclosure by the Researcher

- 4.1 A researcher who believes he/she has put him/herself in, or is about to put him/herself in, a conflict of interest must disclose this situation:

4.1.1 to the chair of the Research Ethics Board (REB) of HEC Montréal if his/her research project is subject to the research ethics review process of HEC Montréal; or

4.1.2 to the Director of Research 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 shall, in collaboration 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 manage 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 manage the conflict of interest. The Secretary-General of the School shall keep a register of declarations of conflict of interest. This register shall be accessible to the public and, in addition to the declarations of conflict of interest made by researchers, it shall contain the measures taken to manage conflicts of interest.

- 4.5 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.

4.6 In the same circumstances, the Director of Research may conclude that the situation constitutes a mismanagement of a conflict of interest 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) Disclosure by a Third Party

4.7 Any person who believes that a researcher has put him/herself in, or is about to put him/herself in, a conflict of interest may disclose this situation to the responsible person.

4.8 The responsible person shall conduct an initial inquiry to determine whether there is a credible basis for the declaration. The researcher shall be informed of any declaration submitted by a third party.

4.9 If the declaration is found to be without a credible basis, the responsible person shall notify the third party and close the file.

4.10 If the responsible person finds that there is a credible basis for the declaration of the third party, he/she shall handle the conflict of interest situation in accordance with the procedure provided for in the preceding section of Article 4.

4.11 The responsible person shall, at the request of the third party, take reasonable steps to protect his/her anonymity.