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Policy Title: Conflict of Interest in Research and Scholarship

Parent Policy	None
Policy Administrator	Associate Provost, Research and Graduate Studies
Approving Body	Senate
Approval History	2026-02-03; Senate Motion #2025/26 –022 2015-06 Revised 2009-01-01

Purpose:

As a place of learning and research, the University encourages its members (faculty , staff, students, and postdoctoral fellows/research associates) to be broadly involved in professional interests and activities compatible with the University’s mission and vision. Trust, confidence, and integrity are paramount in these engagements. Conflicts of interest may arise in various contexts and forms. In a broad sense, a conflict of interest will exist whenever a university member has an interest that adversely affects or provides an incentive to the member’s conduct of her/his University activities. This covers all matters that would lead to any form of personal gain for the member or a related party or give improper advantage to others to the detriment of the University of other Members.

The University, to maintain and ensure public and professional trust and confidence will deal with real or perceived conflict of interest (COIs) in a fair, open and consistent manner. This policy has been created to ensure:

- 1) Research is conducted in a manner free of potential, actual and apparent conflict of interest and maintains the trust of the communication the University and its external constituencies
- 2) Members of the University research community act with integrity and adhere to the highest ethical standards.
- 3) The integrity and objectivity of all research members are protected in the performance of their University obligations and functions.
- 4) The University research community has a mechanism to clearly identify potential, perceived actual or apparent conflicts of interest.
- 5) All potential, perceived, actual or apparent conflicts of interest are properly disclosed, appropriately considered, and managed in keeping with best practices and jurisdictional laws.

Scope of this Policy:

This policy applies to all members of the University (this includes faculty, staff, students, postdoctoral fellows, and other personnel involved directly and indirectly in research, including but not limited to,

research associates, technical staff, adjunct professors, visiting professors, and institutional administrators and officials representing the institution).

Policy Statement:

All Members must:

1. Act responsibly, ethically, and fairly with care, diligence and loyalty and be accountable for his or her actions and decisions in the workplace.
2. Comply with the conflict of interest policies of the University and any applicable conflict of interest policies imposed by other organizations, agencies, or institutions.
3. Not proceed with a research project until any conflict of interest considerations have been disclosed and resolved.
4. Not have their actions and decisions be or be seen to be influenced by private interests, including the interests of immediate family members, other persons living in the member's household, or any other person, company, or agency with which the member shares a financial interest, either directly or indirectly, to the detriment of the University.
5. Not promote or conduct research related to their terms of employment independently of the University.
6. Not approve payment from the University or University administered funds for any services or materials related to the proprietary research or enterprises in which he/she has a direct or indirect economic interest.
7. Not have an enterprise in which the member has economic interest employ university students. However, such an enterprise may enter into contractual agreements to this effect with the University or be a partner with the University within a program of one of the granting agencies.
8. Not use the name or insignia of the University, or the names of its offices or organizations, to promote or serve the interests of any non-university organization.
9. May acknowledge their research sponsors and industrial partners but may not promote their specific products.
10. Not accept gifts, entertainment, travel, or services for personal use from people or companies that do business with the University. Members who desire to accept a gift of significant value must seek the approval of their supervisor and a report will be made to the Associate Provost, of Research a Graduate Studies. Any potential detriment to the University shall be grounds for denial of the request to accept the gift for personal use. Similarly, members who desire to offer a gift of significant value must seek the approval of their supervisor and a report will be made to the Associate Provost, Research & Graduate Studies. Tokens of appreciation of insignificant value may be accepted or offered at the discretion of the member. Members also must be aware that gifts may be regarded as taxable income.
11. Not make more than incidental use of any facilities, services, or equipment for purposes other than those approved by the University and Granting Agencies.
12. Not act, after ceasing to be a member, in such a manner as to take improper advantage of his or her prior association with the University.

13. Not use, for his/her personal gain or advantage, or for the gain or advantage of a related party, any information acquired in the course of his or her involvement in research that is not otherwise available to the public.

Further to the above,

14. When members acquire an interest in an enterprise set up by their colleagues, they do so as private individuals and may not permit their University positions to be used for publicity, endorsement, or advertising purposes except where required by law.
15. When an enterprise in which a member has an economic interest has made a grant, gift, or donation to the University, no payment out of such grant, gift or donation may be made to the interested member without prior approval of the President of the University.

Self-authored/edited educational materials

Many Members author/edit educational materials (including but not limited to self-authored/edited textbooks) that are used in their classes. Producing these educational materials is an important contribution to the scholarship of teaching that the University encourages. However, the assignment of a Member's own educational materials to students may create actual or perceived conflicts of interest to the extent the Member earns royalty payments on the sales of these educational materials.

1. Members who stand to benefit financially from educational materials used in their educational activities must make a conflict of interest disclosure using the procedures linked below.
2. Members should not benefit financially from educational materials that they develop and require for use in TWU courses, whether sold through the TWU bookstore or by an external source. Members should not receive compensation for, including but not limited to, (a) a writer's fee, (b) royalties, (c) an editor's fee, (d) fees for customizing books, and/or (e) honorariums and/or (f) any other type of remuneration for educational materials that they develop and require for use in TWU courses.
3. Members should not accept reviewing or other fees where the fee is contingent on the use of the educational materials in the Member's classes.
4. In no instance should either an individual Member or an academic unit (School or Faculty) accept a financial incentive to adopt specific educational materials.
5. Any and all royalties from the sale of textbooks or other educational materials authored and/or edited by a Member will be donated to a recognized entity from which that faculty member derives no personal financial benefit.

Administration

The Associate Provost, Research & Graduate Studies will be responsible to ensure that all members of the University are aware of the conflict of interest policy and are appropriately informed of their obligations and responsibilities under the policy, and to coordinate policy processes, including record keeping and reporting. Normally, conflict of interest will be dealt with cooperatively between the member and his/her immediate supervisor, informing and drawing upon the assistance of the Dean as required. If a conflict of interest situation cannot be resolved in this manner, the Provost will convene a

Conflict of Interest Committee consisting of two faculty members ratified to serve in this capacity by the University Senate, the member's supervisor, and the University legal officer. The Associate Provost, Research & Graduate Studies will serve ex officio and will chair the committee. The committee will reach a resolution with the member, which will preserve both the intent of the policy and the rights of the member.

Disclosure

The goals of disclosure are transparency and resolution of any potential, actual, or perceived conflict of interest, for the confidence and protection of members, the University, funding organizations, and the public. Members are responsible to seek guidance regarding the necessity of disclosure before embarking on activities which might raise questions about conflict of interest.

1. Undisclosed conflicts of interest are a serious breach of academic responsibility.
2. If a potential, actual or perceived conflict of interest is identified, a member will disclose the conflict of interest situation in writing to his/her supervisor, copied to the Associate Provost, Research & Graduate Studies, using the disclosure form provided on the Research Office website.
3. The member will complete the disclosure process whenever the conflict of interest situation changes, or a new conflict of interest situation arises.
4. Members who are in a position to influence a decision about a purchase or a contract for research purposes must disclose in writing any personal material interest in a prospective vendor to the relevant purchasing administrator, copied to their supervisor and the Associate Provost Research and Graduate Studies. Contracts, purchases, and industry partnerships should be based solely on merit.
5. It is also appropriate to inform interested parties, such as granting agencies, journals, or the Faculty of Graduate Studies, of any conflict that might influence applications for research funding, review of manuscripts, or examination of theses. When publishing the results of any research for which funding was supplied, the member shall name the source or sources of funding in the publication, unless explicit approval to do otherwise has been obtained from the member's supervisor.
6. All information disclosed by a member under this policy will be treated as confidential and will only be disclosed to those directly involved in the administration of this policy. Collection, use, disclosure, and retention of personal information will be conducted in compliance with BC's Freedom of Information and Protection of Privacy Act.
7. If the commitment and activity to be given in relation to an enterprise, such as running for public office, are likely to interfere with academic responsibilities, members will consult their supervisor regarding the advisability of taking a leave of absence or converting to a part-time appointment at the University. Members who have sponsored research in progress should consult the Associate Provost, Research & Graduate Studies.
8. A member who intends to acquire an economic interest in an enterprise must inform all students who may be affected by their actions at the earliest possible date and advise them to seek the advice of the member's supervisor.

9. The supervisor will inform the Dean of the faculty or school of all conflict of interest disclosures involving students.
10. Members are expected to express their views and speak out about matters in their fields about which they are expert. When doing so, they are encouraged to identify themselves as members of the University by title. However, such expressions are solely the responsibility of the individual, and the University assumes no responsibility for them, except in statements issued on behalf of the University by those so authorized to act by the University administration.

Resolution

After disclosure, the member's supervisor, in collaboration with the Associate Provost, Research & Graduate Studies, or the Conflict of Interest Committee will determine if the conflict of interest situation is allowable as disclosed with no further action, allowable if a protocol is implemented to ensure that the conflict of interest is appropriately managed, or not allowable. The supervisor or committee will report their decision to the member and the Associate Provost Research in writing, using the forms posted on the Office of Research Creative and Scholarly Activity website. The University expects the highest standards of ethical conduct in research of its members

1. A conflict is to be allowed only when it can be managed in a way that protects and serves the interests, integrity, and reputation of the University, as well as its legal and contractual obligations, and will stand the test of reasonable and independent scrutiny.
2. If a conflict of interest situation that is not allowable is identified by the member's supervisor and the Associate Provost. Research & Graduate Studies or the Conflict of Interest Committee, the member will withdraw from any responsibilities, discussion, or voting through which conflict of interest may arise, if that is deemed appropriate. Exemptions from participation in discussion or voting on the basis of conflict of interest shall be noted in the minutes of the meeting.
3. If the investigators involved in technology transfer include a faculty member and a student who have a current academic relationship, the academic relationship either will be terminated or the academic judgments of the faculty member should be seen to be unassailable through use of independent consultation and review.
4. If a conflict of interest situation is not disclosed and the member's supervisor and the Associate Provost, Research & Graduate Studies determine that a conflict of interest may exist, they will initiate the conflict of interest process. Sanctions will be commensurate with the extent of the violation and may include termination of funding. The University reserves the right to recover any profit or financial benefit achieved by a member as a result of noncompliance. Any penalties arising from the undisclosed conflict of interest situation will be recommended by the Conflict of Interest Committee to the Provost.

Examples:

It is impossible to list all circumstances in which conflict of interest may or may be perceived to occur. The following are not unusual situations in which conflict of interest could influence the conduct of research:

1. The member is a member of a board or committee charged with evaluation of his/her own research project; for example, the Research Ethics Board, Biosafety Committee, Animal Care Committee, or internal grant committees.
2. The member has a financial interest in the outcome of his/her research and may be in a position to make scholarly or financial decisions that benefit him/her personally, while utilizing University resources and sponsored research funds. Financial interest is recognized as an incentive to research. However, the personal benefits are not, and are not to be seen to be, the overriding consideration in decision making.
3. The investigators involved in technology transfer include a faculty member and a student who have a current academic relationship. If the academic relationship is not terminated, the academic judgments of the faculty member should be seen to be unassailable through use of independent consultation and review.
4. A member accepts without written authorization, a research grant or contract from any non-University organization from which he/she receives, or may subsequently receive, direct or indirect benefits as an executive officer or shareholder.
5. University research facilities and equipment are used to advance private interests of the member without University approval.
6. Ownership by a member or related party of a substantial financial interest in any concern with which the University does business, directly or indirectly, or which is seeking to do business with the University.
7. Entering into financial relationship outside the normal scope of research or teaching assistantship between a faculty member and a student with whom the faculty member has an evaluative role.
8. Using for personal gain, privileged or confidential information acquired as a result of the member's University-supported activities, or passing such information to those who are not authorized to receive such information.
9. Using of one's position within the University to influence any other concern in its dealings with other parties for personal profit or advantage of any person. Using one's academic position to create an inappropriate advantage for oneself or a family member.
10. Entering into a research contract with a company in which the member or related party has a financial or other interest.
11. Using University students or staff to perform work on the behalf of a company or private consulting in which a member has a financial or other interest without the prior approval of the University. Using University resources or facilities without prior approval of the University and without reimbursement to benefit a private concern in which the member has a financial interest.

Definitions:

Conflict of Interest: Conflicts of interest may arise when activities or situations place a person or institution in a real, perceived, or potential conflict between their duties and responsibilities related to research and their personal, institutional, or other interests. Conflict of interest may occur when

individuals' or institutions' judgments and actions in relation to research are, or could be, affected by personal, institutional, or other interests, including, but not limited to, business, commercial or financial interests, whether of individuals, their family members, their friends or their former, current, or prospective professional associations – or of the institution itself.

Granting Agency: includes funding agencies, granting councils/foundation or other entities public or private supporting in whole or in part research and scholarly activities.

Member: Means any member of the University who teaches, conducts research, or works under the auspices of the University and includes any of the following:

- A person who is an employee of the University (faculty members, sessional faculty, staff, adjunct faculty, research personnel)
- Any person who is an appointee (including a volunteer on research related committees and boards) of the University
- Undergraduate and graduate students, post-doctoral fellows, visiting scholars and any other research personnel, while they are engaged in research or scholarly activities under the supervision of a member.

Research: Research for purposes of this policy includes all the processes involved in carrying a research project from hypothesis to dissemination and/or commercialization of results.

Related Party: A person related to a member by blood, adoption, marriage, or common-law marriage, with whom a member has a close personal relationship; it may also include an individual with whom a member has had such a relationship.

Supervisor: The administrative officer to whom the member reports, unless otherwise stated. The supervisor is responsible to consult his/her supervisor as appropriate; for example, in matters concerning terms of employment.

University: Trinity Western University

Procedures: See the use of self-authorized/edited educational materials for teaching for Conflict of Interest in Research and Scholarship.

Child Policies: None

Other Related Policies: AD 1-01 Conflict of Interest

PC 1-08 Gifts, Favours, and Entertainment

R 1-05 Integrity in Scholarship and Research

R 1-06 Intellectual Property

R1-08 Research Ethics with Human Participants

R 1-10 Open Access