



Research Ethics Board

Standard Operating Procedure

SOP File #	REB.SOP.105A
Title	Conflict of Interest – REB Members and REB Office Personnel
Effective Date	July 1, 2021
Next Review	2026
Next Administrative Review	2023

1. Purpose

This standard operating procedure (SOP) describes potential Conflicts of Interest (COI) for Research Ethics Board (REB) members (including the REB Chair and any ad hoc advisors) and REB Office Personnel, and describes the requirements and procedures for disclosure and management of COI.

2. Definitions

See the MSVU **REB Glossary of Terms (REB.INFO.001)**

3. Scope

This SOP pertains to REBs that review human participant research in compliance with applicable policies and guidelines.

4. Responsibilities

All REB members and REB Office Personnel are responsible for disclosing any real, potential, or perceived COI and for ensuring that the requirements of this SOP are met.

5. Procedures and/or Specific Policies

COI (real, potential, or perceived) arise when an individual in a position of trust has competing professional or personal interests. Such competing interests may influence their professional judgment, objectivity and independence and can potentially influence the outcome of a decision for personal benefit. A COI may exist even if no unethical or improper act results from the conflict.

REBs should identify and manage COI to maintain public confidence and trust and to maintain the independence and integrity of the ethics review process. If a COI cannot be avoided, procedures should be in place to mitigate the conflict.

The REB must be perceived to be fair and impartial, immune from pressure by sponsors or funders, Organizations, Researchers whose research is being reviewed, or by other professional and/or non-professional sources.

The standard that guides decisions about considering COI is whether an independent observer could reasonably question whether the individual's actions or decisions could be influenced by factors other than the rights, welfare, and safety of research participants.

5.1. REB Reviewer Assignment

- 5.1.1. The REB Chair or designee reviews the agenda prior to the REB meeting to identify potential COI;
- 5.1.2. When the agenda is distributed, REB members are expected to disclose as soon as possible, any conflicting interest(s) for any of the projects on the agenda;
- 5.1.3. If a member is unclear as to whether a COI exists, they must contact the REB Chair or designee to seek clarification. The REB Chair or designee will determine whether the circumstances should be defined as a COI and the member shall follow the REB's decision regarding any actions required to mitigate their real, potential, or perceived COI;
- 5.1.4. If a COI is identified in the reviewer assignments, the project must be assigned to another REB member.

5.2. Full Board Meeting

- 5.2.1 At the beginning of the meeting, REB members are reminded of their obligation to verbally disclose/declare any real, potential, or perceived COI. All declared COI will be recorded in the REB meeting minutes;
- 5.2.1. If a COI is declared and determined as such, the REB member may be asked to provide information about the research, but must be recused for the deliberation and decision;
- 5.2.2. The REB member's recusal will be recorded in the minutes and the REB member will not be counted towards quorum for the specific protocol for which they are conflicted.

5.3. Delegated Review

- 5.3.1. The REB Chair or designee will assess projects undergoing the delegated review process to determine potential COI;
- 5.3.2. REB members involved in the delegated review process are expected to disclose any conflicting interests;
- 5.3.3. If a COI is identified, the project will be assigned to another REB member.

5.4. REB Chair

- 5.4.1. In the event that the REB Chair declares a COI, the Vice-Chair or alternate REB member will assume the REB Chair's responsibilities for the specific project(s).

5.5. REB Office Personnel

- 5.5.1. All REB Office Personnel are expected to disclose any conflicts that may arise with a particular research project, including any implications to their job status or compensation. If a COI exists, they must recuse themselves from review of that research project;
- 5.5.2. Any disclosure of a COI by REB Office Personnel should be referred to the REB Chair or designee for the development of a management plan;

5.5.3. If REB Office Personnel are unclear as to whether a COI exists, they must contact the REB Chair or designee to seek clarification. The REB Chair or designee will determine whether the circumstances should be defined as a COI.

5.6. External Ad Hoc Advisors

- 5.6.1. At their discretion, the REB Chair or designee may invite individuals with competence in special areas to assist in the review of issues that require expertise beyond or in addition to that available on the REB;
- 5.6.2. All ad hoc advisors must sign agreement(s) addressing *confidentiality of information and conflicts of interest* prior to commencement of their consultation and disclose any COI to the REB Chair.
- 5.6.3. Any disclosure of a COI by an ad hoc advisor should be referred to the REB Chair or designee for the development of a management plan, as applicable.
- 5.6.4. If ad hoc advisors are unclear as to whether a COI exists, they must contact the REB Chair or designee to seek clarification. The REB Chair or designee will determine whether the circumstances should be defined as a COI.

5.7. Documentation

- 5.7.1. All REB members, guests and ad hoc advisors must sign agreement(s) addressing confidentiality of information and conflicts of interest and agree to abide by the REB COI and confidentiality policies;
- 5.7.2. The signed agreement(s) will be retained in the REB office;
- 5.7.3. The REB minutes will record any COI that are declared on any of the projects under review at the REB meeting, and the decision on the management of the conflict;
- 5.7.4. The REB minutes will also record the recusal of an REB member;
- 5.7.5. At the time of hire, REB Office Personnel are required to sign agreement(s) addressing confidentiality of information and conflicts of interest as a condition of their employment, as per the Organization's hiring practices. Otherwise, this agreement should be considered implicit with conditions of their employment. REB Office Personnel must also comply with REB COI SOPs;
- 5.7.6. The signed agreement(s) will be retained;
- 5.7.7. The REB management plan for COI declarations will be documented in the appropriate files. Any discussion at the REB meeting regarding the COI and the management plan will be documented in the REB meeting minutes.

6. References

See References listed (if applicable)

7. Acknowledgements

The development of this document has benefited directly from similar documents made public by the Tri-Council, as well as several Canadian universities. In some instances, specific formulations drawn from these sources have been incorporated into this document. Specific iterations were drawn from the following:

- Standard Operating Procedures for Observational Health and Non-Clinical Trial Research Ethics Boards - [N2/CAREB-ACCER REB SOPs – Canadian Association of Research Ethics Boards](#) (retrieved June 2021)

- N2/CAREB-ACCER REB SOPs - N2 Network of Networks - [Resources - N2 Canada](#) (retrieved May 2021)

8. SOP History

SOP Number	Key Changes	Effective Date
REB.SOP.105A	Minor Revisions for EDI Language	July 30, 2021
REB.SOP.105A	New - Implementation of new SOP outlining Conflict of Interest for REB Members and REB Office Personnel	July 1, 2021