## Contents

1. Purpose of This Document........................................................................................................... 1
2. Defining Conflict of Interest........................................................................................................ 1
3. Reporting Conflicts of Interest................................................................................................... 3
   3.1 Responsibility to Report.......................................................................................................... 3
   3.2 Annual Paid Activity Reporting............................................................................................. 3
   3.3 Use of Annual Paid Activity Reports..................................................................................... 4
4. Managing Relationships............................................................................................................. 6
   4.1 Industry Representatives........................................................................................................ 6
   4.2 Consultation to Industry......................................................................................................... 7
   4.3 Educational Events and Programs......................................................................................... 7
      4.3.1 Guest Speakers................................................................................................................ 8
      4.3.2 Conference Management............................................................................................... 8
      4.3.3 Registration................................................................................................................... 8
      4.3.4 Disclosure at Educational Events and Programs............................................................. 8
      4.3.5 Industry Hosted Educational Events and Programs....................................................... 9
6. Disclosure..................................................................................................................................... 9
   6.1 Transfer of Value.................................................................................................................... 9
   6.2 Compensation........................................................................................................................ 9
   6.3 Resources................................................................................................................................ 9
7. Reporting Conflicts of Interest.................................................................................................. 10
   7.1 Industry Representatives........................................................................................................ 10
   7.2 Consultation to Industry......................................................................................................... 10
   7.3 Educational Events and Programs....................................................................................... 10
      7.3.1 Guest Speakers................................................................................................................. 10
      7.3.2 Conference Management.............................................................................................. 10
      7.3.3 Registration.................................................................................................................... 10
      7.3.4 Disclosure at Educational Events and Programs.......................................................... 10
      7.3.5 Industry Hosted Educational Events and Programs...................................................... 11
   7.4 Disclosure in Publications...................................................................................................... 11
   7.5 Ghostwriting........................................................................................................................ 11
   7.6 Hospitality............................................................................................................................. 11
   7.7 Funding for Postgraduate Programs..................................................................................... 12

### Appendix A: Examples of Conflict of Interest in Public Health

1. The Motherisk Program at Sick Kids Hospital......................................................................... 12
2. McMaster University................................................................................................................... 12
3. Center for Disease Control and Prevention (USA)................................................................. 12
4. The American College of Physicians (ACP)........................................................................... 12
5. Example Prohibited Activities from ICES............................................................................... 13
6. Example of Payment and Benefits to Individuals for Allowable Activities from ICES........... 13

### Appendix B: Additional Resources .......................................................................................... 14
1 Purpose of This Document

The University of Toronto has a Policy for Academic Staff on Conflicts of Interest and a Policy on Conflicts of Interest and Close Personal Relationships. The latter of these is sufficient to guide DLSPH Faculty regarding appropriate close personal relationships among colleagues, students, teaching and research assistants, and sexual harassment because DLSPH is no different than other faculties in this regard.

With respect to paid and unpaid professional relationships, however, additional guidance tailored for DLSPH is appropriate. This is because our mandate to impact health and public health systems is highly dependent on a uniquely complex web of relationships with our partners spanning academia and government as well as the for- and not-for-profit private sectors. This document, therefore, applies to both Faculty and Staff of the DLSPH community.

On this basis, the goal of this guidance document is to assist Faculty and Staff in protecting and preserving public trust in the integrity, reputation, and accomplishments of their work, as well as the work of DLSPH and the University as a whole. An additional goal is to ensure DLSPH operates in a manner consistent with the intent and spirit of Ontario’s Health Sector Payment Transparency Act, 2017.¹ The Transparency Act aligns with several DLSPH values: Integrity, Engagement and Collaboration, Equity and Social Responsibility, Ethical Conduct and Engagement, and Accountability; and thus motivated development of this guideline despite the fact that the Transparency Act has not been regulated.

This guideline focuses on individual Conflict of Interest through the lens of public health. The spirit of this guideline is grounded in the behaviours that are expected at DLSPH - courage, honesty, humility, respect, integrity, and transparency.

These behaviours are valued at DLSPH because they keep knowledge producers accountable for the knowledge they generate and the ideas they spread. They also help knowledge users – health and public health systems leaders, as well as the public writ large - trust this knowledge to make informed decisions.

2 Defining Conflict of Interest

Conflict of Interest can include perceived or actual bias, personal interest, personal gain, or feelings of allegiance to a person, group or organization because of prior/ongoing relationship, commitments, and interactions. The University of Toronto’s Policy on Conflict of Interest – Academic Staff defines a Conflict of Interest as existing when (for DLSPH this will apply to both Faculty and Staff):

- “A Faculty member’s paid professional activities undermine rather than enhance the Faculty member’s ability to meet the Faculty member’s responsibilities to the University; or
- “A Faculty member’s non-professional activities, which are engaged in for personal gain, undermine rather than enhance the Faculty member’s ability to meet the Faculty member’s responsibilities to the University; or
- “A Faculty member’s personal or financial interest conflicts with the Faculty member’s responsibilities to the University.”

Conflict of Interest in the context of public health is particularly concerned with the neutrality of an individual being compromised when they receive compensation or other resources from outside interests

¹ Note that the Transparency Act has not yet been implemented because the current provincial government has not finalized regulations
that can impact public health. For example, organizations or individuals operating within industries such as pharmaceutical, oil and gas, sugar, alcohol, or tobacco.

Biases often act on a subconscious level and are triggered by the gift relationship, i.e., receiving something from a third party leading to the feeling that the “gift” needs to be reciprocated. This loss of neutrality can lead to distortion of health-related knowledge or misrepresentation of the value of health-related interventions, thus creating an integrity gap, and potentially resulting in recommendations and decisions that benefit the recipient and the partner organization at the expense of broader public health concerns.

Conflict of Interest does not imply wrongdoing and can be managed so it is not compromising. First, DLSPH Faculty and Staff can evaluate the potential for a real or perceived Conflict of Interest due to a relationship with partners outside the Dalla Lana School of Public Health or University of Toronto before investing in that relationship.

If a potential Conflict of Interest does arise, then a decision must be made about whether the partnership should continue. If the partnership continues, the DLSPH member should recognize, disclose, and manage and mitigate the potential conflict to ensure distortion or misrepresentation of health-related knowledge, or the value of health-related interventions, does not occur.

Additional examples of financial situations in which Conflict of Interest can emerge include:

- Receiving consulting fees from a company
- Owning stock in a company while performing research sponsored by that company
- Conducting federally funded research that could affect the financial interests of a company in which the investigator has a personal financial interest
- Involving students or post-docs and trainees in work that could directly benefit a company in which the supervising Faculty or Staff member has a personal financial interest
- Giving a company preferential access to results of partner-conducted research while also providing personal consulting services to that company
- Participating in institutional purchasing decision about products made by a company in which you hold stock
- Receiving licensing milestone payments for licensed technology while performing clinical research on that licensed technology
- Holding a partner hospital staff appointment while having an executive position at a for-profit biomedical company
- Serving on the Board of Directors of a company while participating in clinical research on the company’s technology
- Serving on the Board of Directors for a company while receiving sponsored research from that company
- Accepting a gift from a vendor
- Being involved in the decision to hire a company in which your spouse is an employee to provide services to partners

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2 For details, see https://www.partners.org/About/Ethics/Interactions-With-Industry/Description-of-COI.aspx
3 Reporting Conflicts of Interest

Transparency is the most effective way of handling a true or perceived Conflict of Interest. Based on this effectiveness, Ontario’s provincial government passed the *Health Sector Payment Transparency Act*, 2017. The purpose of the *Transparency Act* is to “require the reporting of information about financial relationships that exist within Ontario’s health care system, including within health care research and education, and to enable the collection, analysis and publication of that information in order to:

a) strengthen transparency to sustain and enhance the trust that patients have in their health care providers and in the health care system
b) provide patients with access to information that may assist them in making informed decisions about their health care
c) provide the Minister and others with information for the purposes of health system research and evaluation, planning and policy analysis
d) provide for the collection, use and disclosure of personal information for these purposes”

It is also important to note that transparency is necessary but not sufficient for handling Conflict of Interest. There is evidence that once an individual has declared their conflicts, they feel more at liberty to deceive their audience because they feel that the audience has been warned.

3.1 Responsibility to Report

It is the responsibility of all DLSPH community members to whom the U of T Conflict of Interest policy applies to report actual, perceived, or potential Conflicts of Interest. DLSPH members that are cross appointed with other faculties (e.g. to the Faculties of Medicine or Nursing) are not required to file an additional report with DLSPH.

3.2 Annual Paid Activity Reporting

Currently, DLSPH Faculty paid by the University are required to complete an Annual Paid Activity Report. Staff are not required to complete this report. This is an opportunity for Faculty to take account of existing partnerships, not only to identify any real or perceived Conflict of Interest, but also to identify professional network strengths and weaknesses. We recommend providing as much detail on partnerships during the preceding year with:

- Agencies/Institutions/Foundations from which grants, contracts and donations are received (including CIHR, SSHRC and NSERC)
- Consulting activities (regardless of whether these are for public sector (government or non-governmental sector) or private sector organizations)
- Executive Positions External to the University
- Positions of Influence, such as advisory boards or working groups external to the University
- Speaker’s Bureaus
- Expert Testimony
- Ownership interest
- Financial Interest
- Gifts over $10 (limit defined by the Transparency Act)
A Conflict of Interest will not be considered a risk in situations in which Faculty members are paid primarily by a trusted employer (e.g. teaching hospitals) where the source of funds has potential to create a perceived Conflict of Interest (e.g. pharmaceutical companies) and the Faculty member has no knowledge or control of these funds. DLSPH will defer to the trusted employer’s judgement with respect to Conflict of Interest in these situations. The Faculty member is advised to notify DLSPH if a Faculty member’s primary employer identifies a potential Conflict of Interest.

This is also a time to reflect upon dealings with family members, including conducting business with family members or industry providing compensation or resources through family members. The latter is considered the same as taking funds directly.

If a Faculty member is concerned about a family member’s business dealings (e.g. ownership of ethically concerning stock) they should discuss this with DLSPH leadership. Ultimately, the responsibility and decision to disclose rests with the Faculty member and each Faculty member will have to be guided by their conscience. Remember though, DLSPH leadership cannot help if they do not know what is going on.

3.3 Use of Annual Paid Activity Reports.
Our relationships are considered a point of pride and demonstrate the collective reach, influence, and impact of our School on public health. We will often highlight effective and impactful partnerships in our School’s Annual Report. Accordingly, we prefer to understand Faculty and Staff relationships with outside partners so these relationships can be managed well. Annual Paid Activity Reports can be used to disclose conflict of interest and conflict of commitment. The annual Paid Activity Report is treated confidentially. The Annual Activity Report can also be used to share a narrative describing relationships with outside partners, which can be used to both disclose and help manage conflict of interest.

Annual Paid/Activity Reports are submitted to the Office of the Associate Dean of Faculty Affairs for review, management, and aggregation. Aggregated data will be shared with communications for the School’s Annual Report. Individual reports are reviewed by the Dean or the Dean’s designate to:

- Identify areas or risk from a Conflict of Interest at the level of individual Faculty members, departments, or divisions, or the Faculty itself where the conflict has had a real or perceived negative effect
- Identify areas of risk if a large proportion of funding is coming from a single private source
- Aid Faculty members to manage and resolve where Conflict of Interest has had a real or perceived negative effect

In the event that a review flags concern about relationship(s) between Faculty and outside interests, the Dean will have a conversation with the Faculty member to clarify the relationship and determine what supports are needed to address real, possible, or perceived Conflicts of Interest. The Dean, along with the senior administration, will form an advisory committee to advise on managing more complex relationships, when needed.
3.4 Disclosure

3.4.1 Transfer of Value

Disclosing transfer of value is an essential first step in managing Conflict of Interest, even if it does not always manage actual or perceived conflicts adequately. Transfer of value is a transfer of some form of value or benefit from an outside organization to a health provider or researcher.

Transfer of value can come in a variety of forms (payment, equity in a company, gifts, trips, etc.) and can be received directly, or indirectly by having the compensation intended for a Faculty or Staff member go to someone or something directly connected to that Faculty or Staff member (e.g. family, pension accounts). Indirect transfer of value is the same as accepting the benefit directly.

3.4.2 Compensation

DLSPH members are entitled to compensation for their time, knowledge and work done beyond the expectations and support of their position. Financial compensation is the most clean and clear way of recognizing and reporting professional activity. It avoids speculation, the appearance of undue benefit, and the perception of Conflict of Interest.

Token gifts of appreciation or recognition, for instance, for mentoring or other service, are acceptable. However, note that in the US, it has been shown that there is an association between receiving a meal valued at less than $20 and an increase in prescribing of products made by the company providing the meal. Gifts, equity, or promises of future support or compensation should not be accepted from industry.

The U of T Conflict of Interest Policy states (for DLSPH this should be considered to apply to both Faculty and Staff):

The acceptance of gifts from individuals or organizations which are associated with the University activities of the Faculty member, with the exception of minor gifts as token courtesies, is not normally permitted. If a Faculty member has any doubts about the propriety of accepting a particular gift, the Faculty member should discuss the matter with the person to whom the Faculty member reports.

The Policy also states:

"Gifts" include not only articles of value, but also includes, and is not limited to, travel, accommodation, extravagant meals, and the like, including those that might be provided by commercial external sponsors of continuing education programs or conferences in which the Faculty member is playing no role other than that of an attendee, or by external organizations which offer products or services related to the Faculty member's profession in situations in which the Faculty member may be in a position to influence others to use the external organization's products or services.”

3.4.3 Resources

Seeking and finding resources are essential activities for supporting research and education. It is also important to be transparent about the source of these resources. Resources include materials, equipment, reagents, space, computers, swag, staff, and other assets that can be drawn on by a person or organization to function effectively.
The Transparency Act states that a transfer value will be assigned to all resources and other benefits conferred including:

- Cash or cash equivalents
- Compensation for services, including speaking fees or consultant fees
- Event sponsorships
- Membership fees
- Facility or rental fees
- Entertainment, social, and sporting events
- Food and beverages
- Travel and accommodation
- Referral fees
- Charitable contributions
- And others

There are a few exceptions that are excluded from the Transparency Act definition of resources. These include:

- Transactions with a dollar value of less than $10
- Salary and benefits provided as part of direct employment
- Samples and educational materials

4 Managing Relationships

4.1 Industry Representatives

Different industries (e.g. tobacco, pharmaceuticals, sugar, oil and gas, medical devices, etc.), and hence industry representatives, will approach Faculty from each unit and division within the DLSPH for consultation, collaboration, knowledge exchange, knowledge transfer, or other professional activities. This is not common for Staff members but the same guidance applies should it occur.

Faculty who want to avoid Conflict of Interest altogether may choose to avoid meeting with industry representatives. Faculty who do decide to meet with industry representatives need to recognize the Conflict of Interest those contacts bring with them to the relationship – meaning industry representatives are first and foremost accountable to the company they work for, and ultimately their interest is the betterment of the company and value to shareholders.

It may be that what is good for the company is good for society, for example, safer pharmaceuticals. However, there is evidence that pharmaceutical representatives do not mention safety information regarding the drugs they are promoting. Information that representatives supply about their industry, and especially related to their products, is generated with public relations and marketing in mind. Therefore, industry generated information should not be relied on as a sole or major source of information.

It is also important to recognize industry representatives may not be direct or transparent about their intentions, nor may their intention be limited to promoting or advancing their products. Some representatives may interact to distract or deflect attention, or otherwise protect their product or
industry. For instance, representatives from the food industry may want to address the obesity epidemic and use that banner to distract from their own business practices that contribute to obesity.

Regardless of the industry, every individual has an agenda. **Do not assume agendas and underlying intentions align just because the topic of interest does.** Use due diligence. Mentalize the business needs, interests, and politics that industry partners are operating within and have open and transparent conversations about intentions, priorities, and competing interests.

Conflicts of Interest can influence, and jeopardize, the autonomy of research and the researcher, eroding the fundamental value of autonomous academic research. Training around ethical standards related to interactions with industry and the resultant potential Conflicts of Interest should be provided to students.

### 4.2 Consultation to Industry

Faculty members may receive compensation for provision of special expertise in consultation to industry. Such remuneration must be commensurate with the work done and must be disclosed in the annual disclosure report. Acceptable activities include:

- Scientific education sessions to improve the knowledge of company personnel.
- Consultation for public advocacy, health promotion, or to develop better products for health care.
- Participation in industry-funded public education not related to a specific brand product.

Faculty members should not participate in **Speakers’ Bureaus** organized by a company. This is defined as any relationship in which the Faculty member is paid by, or under contract to, a company to give talks and the company selects or has influence over any of: the topic, any part of the content of a talk, or any members of the audience.

Participation in a speaker’s bureau makes a Faculty member a *de facto* employee of the company. Programs run by for-profit educational companies are included in this category. Faculty members should not participate in industry marketing or sales programs.

### 4.3 Educational Events and Programs

Educational events and programs include seminars, lectures, journal clubs, continuing education programs and conferences. Educational events should be planned to address the educational needs of the learners, whether degree program students, summer interns, post-doctoral fellows, community partners or other trainees.

Content, organization, and financial arrangements should all be controlled by Faculty or Staff organizers without influence from private sector sponsors. Events within postgraduate training programs should be managed by the program administration.

Funding for educational events should be in the form of unrestricted grants in which the donor has no influence over program content, choice of speakers, or those in attendance. Donors should be acknowledged at each event where the funds are used through mention of company/organization name but not by product names. Funds should not be held by an individual event organizer but should be held centrally by the School.
Responsible use of sponsorship funding must include only reasonable and properly documented expenses that correspond to a prepared itemized budget. Expected use of any unexpended funding should be discussed in advance with sponsors. Financial statements for sponsored events must be prepared and available for audit, including by the sponsors, as already noted in the sponsorship policy.

4.3.1 Guest Speakers
Choice of speakers, subjects of presentations, travel arrangements, expenses, and honoraria should all be arranged and paid through the Faculty or Staff organizers of the event and not by sponsors or their agents. Speakers should not be nominated by sponsors or chosen from a list prepared by them.

4.3.2 Conference Management
Organizers of events, including partnerships and co-sponsorships, may engage conference management companies hired through the event budget.

4.3.3 Registration
Registration for sponsored events should be through the University or Faculty or Staff member organizers or conference management company and not through an industry or sponsor’s representative. DLSPH and organizing Faculty or Staff members retain independence from the sponsor with respect to determining who among the DLSPH community can register and attend sponsored events.

4.3.4 Disclosure at Educational Events and Programs
All speakers at educational events, whether Faculty, Staff or guests, must fully disclose in writing prior to the event to the organizers, and again at the beginning of each lecture. This disclosure best presented as a dedicated item at start of a talk to ensure the audience has time to understand your conflicts and make connection with the work presented.

This disclosure must include any potential Conflicts of Interest with industry, including relationships with competing corporations. This includes invited speakers, guest lectures in courses and other lectures within the School’s educational programs.

Potential conflicts include but are not limited to personal and non-personal and specific and non-specific relationships such as partnerships, ownership of shares, receipt of consultation fees, membership on advisory boards or speakers’ bureaus, and funding for research. Relevant conflicts also include those of immediate family members including spouses or partners, children, and parents.

In presentations, written, and AV materials, the use of generic names for drugs, devices, or other products is preferable to the use of trade names. If a trade name is used, the generic name should also be given, and other commonly available alternatives should also be mentioned.

Faculty or Staff members or trainees using presentation slides prepared by industry or any other organization is generally discouraged, and a specific verbal and written acknowledgement must be included on each slide when this is done. Such use should be informed by a consideration of potential bias in the production of such materials. The usual rules of attribution require that use of slides prepared by any other person should be acknowledged.
Faculty and Staff members must also disclose potential Conflicts of Interest when participating in curriculum committees or in guideline or standard-setting committees or panels. Occasionally potential Conflicts of Interest will preclude participation in some parts of an agenda. This applies to Faculty and Staff members involved in curriculum committees in all programs within the Faculty, not only those sponsored by industry.

4.3.5 Industry Hosted Educational Events and Programs
Faculty or Staff may be invited to attend and present at events organized by industry representatives. Faculty or Staff participation should be for the purposes of education and should be declared.

4.4 Disclosure in Publications
Faculty members are advised to disclose potential Conflicts of Interest in publications to which they have contributed. This is not common for Staff members but the same guidance applies should it occur.

4.5 Ghostwriting
As outlined in the University of Toronto Framework to Address Allegations of Research Misconduct, Faculty members must not agree to publish as author any article written in whole or part by the employees or agents of a company unless contributions are clearly disclosed by authorship or acknowledgement.

Frequently Faculty members do not have access to all the raw data and have not analyzed the data themselves but rely on analyses done by industry. We recommend against co-authoring under these conditions.

Rules for authorship, such as those the International Committee of Medical Journal Editors (ICMJE) and World Association of Medical Editors (WAME), should be observed. These rules will not prevent collaboration or co-authorship with industry researchers who are named co-investigators on Faculty led research.

This is not common for Staff members but the same guidance applies should it occur.

4.6 Hospitality
Offering hospitality and sharing food and drink may be appropriate at educational events. However, arrangements for commercial entities to provide and/or pay for food have been found to engender obligation and give rise to potential Conflict of Interest and undue influence and have fostered an inappropriate sense of entitlement among participants.

Industry representatives should not provide food and drink directly for educational events. If food and drink are provided, it should be arranged by the program or the School. Use of “unrestricted” educational grant funding for refreshments should be in keeping with departmental policies and representatives of sponsors should not be in attendance.

Industry-sponsored dinners, even those labelled as educational events, fall into the category of accepting gifts and will need to be declared. It will also fall under the Transparency Act and be reported by the sponsor to the Ministry with a dollar transfer value included.
Hospitality, including food, may appropriately be part of events, such as full day or longer programs or conferences, but should have no direct link to a sponsor and should be arranged by the event organizers, and accounted for in the event budget.

4.7 Funding for Postgraduate Programs

Industry may contribute to educational funding of postgraduate training programs, unrelated to specific events, provided that:

- Support is received as an unrestricted educational grant
- Support is publicly acknowledged
- The funds are managed centrally by the School. Financial statements should be prepared and available for audit
- The donor plays no role in selecting recipients of any scholarships or travelling funds
- No *quid pro quo* is established in any such arrangement
Appendix A: Examples of Conflict of Interest in Public Health

The Motherisk Program at Sick Kids Hospital

This program founded in 1985, by Dr. Gideon Koren, for research and clinical care related to the safety and impact of drugs on the developing fetus and newborn. It also operated a drug testing laboratory (MDTL). In late 2014, concerns were raised about the quality and validity of drug tests performed by the MDTL for use in legal proceedings.

Retired Justice Susan Lang was appointed by Order in Council in November 2014 to conduct an independent review of MDTL and SickKids proactively investigated and addressed these concerns and continues to cooperate with the independent review. Significant and completely unacceptable issues were discovered regarding the MDTL, including: lack of forensic accreditation; lack of quality assurance program and standard operating procedures; methodologically insufficient confirmatory drug testing; and the Research Institute did not oversee the activities or results of MDTL at a granular level to ensure patient safety. These problems put the results of 16,000 child protection cases and six criminal cases into doubt.

Consequently, SickKids permanently closed the MDTL in March 2015 and Dr. Koren’s research program was scrutinized for scientific integrity, potential Conflicts of Interest, and other research related activities. Scientific controversy was associated with one study; however, scientific misconduct was not confirmed.

The pharmaceutical company Duchesnay Inc. Canada, the manufacturer of Diclectin – the only drug approved by Health Canada to treat nausea and vomiting in pregnancy – was a source of funding for Motherisk programs and research and some of the research and clinical work of Motherisk focused on the use of Diclectin.

The former Director of Motherisk, Dr. Koren, also consulted for Duchesnay. Motherisk provided information on Diclectin on its call lines and in its pamphlets, without consistently declaring Duchesnay’s role as a funder of Motherisk. Duchesnay’s support and the support of other companies was also not consistently acknowledged on the Motherisk website and in several Motherisk pamphlets. SickKids added disclosures to the Motherisk website and Motherisk publications, noting all corporate funding received by the program of over $5,000 in the previous four years. A disclosure statement noting Duchesnay’s support for Motherisk was added on pamphlets/sites that specifically mention Diclectin.

Finally, as a consequence of the findings of the investigation, fourteen studies that were currently active, were appointed a new Principal Investigator and the remaining studies have, or will be, closed.

McMaster University

McMaster “received $618,248 from Health Canada to revise prescribing guidelines that were last updated in 2010 and out of step with research showing that the risks associated with opioids are substantial and the benefits uncertain. In its application for federal funding to update the guidelines, McMaster’s Michael G. DeGroote National Pain Centre said "the key to developing conflict-free recommendations" is requiring panel members who vote on the standards to have no financial ties to the pharmaceutical industry.”
“However, one of the 15 panel members who voted on the guidelines, Sol Stern, a family doctor in Oakville, Ont., has been a paid speaker and advisory board member for four drug companies...” Federal Health Minister Jane Philpott ordered an external, independent review of this case.

Center for Disease Control and Prevention (USA)
Barbara Bowman, previous director of the Division for Heart Disease and Prevention at the CDC, “joined the CDC in 1992 after working as a senior nutritionist at Coca-Cola. Bowman continued to work with Coca-Cola while at CDC through the International Life Sciences Institute, an industry front organization whose members include multiple soda companies, including Coca-Cola, and the agricultural giant Monsanto. Bowman resigned her position at CDC at the end of June, days after these ties became known.” (Lenzer. 2016. BMJ. Conflicts of interest compromise US public health agency’s mission, say scientists)

The American College of Physicians (ACP)
ACP observed that “[p]hysicians meet industry representatives at the office and at professional meetings, collaborate in community-based research, and develop or invest in health-related industries. In all of these spheres, partnered activities often offer important opportunities to advance medical knowledge and patient care, but they also create an opportunity for the introduction of bias”

Example Prohibited Activities from ICES
It is not possible to provide an exhaustive list of all prohibited activities. The following situations serve as examples.

1. Using one’s position, influence or authority in ICES for individual/family financial interest or benefit
2. Using ICES resources or information gained through employment, appointment or affiliation with ICES for individual/family financial interest or benefit
3. Allowing a sponsor or stakeholder of ICES (or of ICES research) the right to veto or change the design, analysis, interpretation or reportage of research findings or its dissemination (an opportunity to comment is allowable so long as it does not exceed 30 days)
4. Guaranteeing to a sponsor or stakeholder of ICES (or of ICES research) a specific scientific finding
5. Conducting research with, or for, another entity which uses ICES data, name, resources, logo or business tools without ICES approval
6. Accepting money, individual interests/benefits, or family interests/benefits from a for-profit entity for research which uses ICES data, name, resources, logo or business tools
7. Posing a research question or designing, analyzing, interpreting or reporting a study in order that it will or may produce individual/family financial interest or benefit
8. Signing a contract or agreeing to an undertaking on behalf of ICES that is contrary to this Policy
9. Using an ICES employee for non-ICES work or activities that contribute to one’s individual/family financial interest or benefit
10. Owning stock or stock options in, being employed by, acting as a Director of, or otherwise receiving a financial interest or benefit from a for-profit company that is related to a drug, technology or health service that ICES is studying or may reasonably do so in the future

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11. Being a member of a Speakers Bureau (or equivalent speaker arrangement) for a for-profit company or entity

12. Providing educational or research talks for a for-profit company or entity where the individual does not create the content and is not able to exercise academic control over the content and its delivery. Note: even if these conditions are met it may still be prohibited activity if these particular features are not transparent to ICES or the audience and/or if it otherwise compromises the public’s trust in ICES

13. Acting as a consultant or advisor for a for-profit company or entity and providing non-scientific general or specific business advice, regardless of the dollar amount involved

14. Acting as a consultant or advisor for a for-profit company or entity without having a written agreement or written contract acceptable to ICES. Such an agreement/contract should be for a fixed-term and explicitly set out expectations for each of the parties with no further obligations after the termination date. These contracts must be submitted to ICES at the time of COI declaration

15. Taking any administrative action (including, but not limited to, hiring of staff, procurement of materials, managing contracting, selecting equipment or supplies) within or on behalf of ICES with an organization/individual where an individual (or family member) stands to gain a financial interest or benefit (or appears to be doing so)

16. Offering or accepting financial interest or benefit in order to influence business transactions in which ICES is involved

17. Using ICES resources (e.g. ICES email, computer networks, mobile devices, postal location, facsimile, computers, printers, office space) for any prohibited activity

Example of Payment and Benefits to Individuals for Allowable Activities from ICES

It is acceptable to receive reasonable honorariums, stipends, payments or small gifts paid directly to the individual from a for-profit or non-profit company or entity for providing a specific allowable activity/service as long as these, by their frequency or amount (singly or accumulated) do not affect (or reasonably be perceived to affect) an individual’s work at ICES or ICES’s mission or reputation.

Certain allowable activities are nonetheless subject to annual total remuneration limits to be considered allowable by ICES. Specifically, individuals may not receive remuneration or financial benefit directly or indirectly from for-profit companies or entities for educational talks, advisory/consultative roles and activities that exceed the annual dollar value limit as determined by ICES from time to time. The current total allowable limit is $10,000 per annum for all such activities.
Appendix B: Additional Resources

- University of Toronto’s Policy on Conflict of Interest – Academic Staff
- University of Toronto’s Statement on Conflict of Interest and Conflict of Commitment
- Ontario’s Health Sector Payment Transparency Act
- The Faculty of Medicine’s Relationships with Industry and the Educational Environment in Undergraduate and Postgraduate Medical Education
- Canada’s Conflict of Interest Act