



PGME Conflict of Interest Policy

Category:	Ethics, Privacy and Professionalism
Responsibility:	Associate Dean, PGME
Approval:	PGME Committee
Date:	Date initially approved: September 22, 2022

Purpose:

The purpose of this policy is to outline the principles and process for recognizing, disclosing, and managing conflicts of interest (COI) at the Postgraduate Medical Education (PGME), College of Medicine level so they may apply this policy to their activities.

This policy is written in accordance with the [University of Saskatchewan Conflict of Interest Policy](#), the [General Standards of Accreditation for Institutions with Residency Programs](#) and the [Support on Continuing Medical Education Events from Commercial Sources Policy](#).

Principles:

The PGME policy for addressing conflicts of interest is based on the principles of recognition, disclosure, and management and to promote transparency to effectively deal with conflicts of interest.

Recognition: Conflicts of interest must be acknowledged and identified to allow appropriate disclosure and management. Conflicts of Interest reflect the situation, not the character of the person.

Disclosure: Individuals must take initiative in disclosing conflicts of interest to whom they are responsible for reporting to at the university. Full disclosure of conflicts of interest is important for protecting the integrity and reputation of the individual and the university.

Management: Only conflicts of interest that can be managed in a manner that considers, protects, and serves the interests, integrity, and reputation of the individual and of the university, and that will withstand the test of reasonable and independent scrutiny will be allowed.

Scope of this Policy:

This policy applies to members of the University of Saskatchewan, College of Medicine, Postgraduate Medical Education program (PGME members). A member means all faculty, staff, trainees, students, and adjuncts of the University of Saskatchewan, whether fulltime, reduced, or part-time, and any other person while acting on behalf of or at the request of PGME including, but not limited to members of a PGME committee, persons giving advice or providing services to

PGME at the request of PGME, and anyone involved in a decision-making process. This policy applies to PGME related activities only.

No member of the PGME community will be discriminated against for being involved in a conflict of interest so long as the individual has acted in good faith and in accordance with this policy and any other related University policies.

Definitions:

Conflict of interest: a situation in which financial or other personal considerations have the potential to compromise or bias professional judgement and objectivity. An apparent conflict of interest is one in which it is reasonable to think that the professional's judgement is likely to be compromised. An apparent conflict of interest may develop into an actual conflict of interest.

Program: is the Royal College of Physicians and Surgeons of Canada (RCPSC) or the College of Family Physicians Canada (CFPC) accredited residency training program at the College of Medicine.

Postgraduate Medical Education (PGME): Office refers to the Associate Dean, PGME and the administrative personnel who are responsible for coordination and administration related to the oversight of the residency training programs.

Conflict of Interest Committee: is a subcommittee of the Residency Program Committee which is responsible for the recognition, disclosure, and management of apparent or actual conflicts of interest.

Types of conflicts to be disclosed can include (but are not limited to):

- Any direct financial payments including receipt of honoraria
- Membership on advisory boards or speakers' bureaus
- Industry funded grants or clinical trials
- Patents on a drug, product, or device
- Accepting gifts, benefits or favours from students, instructors, faculty, or preceptors
- Supervising or evaluating a student who is a member of the immediate family or a person with whom there exists or has recently existed a friendship, an intimate, personal, or financial relationship
- Participating in decisions, CaRMS interviews, or assessment of medical learners where the learner is a member of his or her immediate family, or a person with whom there exists or has recently existed a friendship, intimate, personal, or financial relationship
- Supervising or evaluating a student where there exists or has recently existed a counselling/advising relationship
- All other investments or relationships that could be seen as having the potential to influence professional judgment or objectivity with respect to the content of the educational or non-educational activity.

Responsibilities:

PGME members are responsible for being aware of and adhering to this policy.

PGME members are expected to always conduct themselves with the highest ethical standards in a manner which will bear the closest scrutiny; are responsible for recognizing a conflict of interest and for seeking guidance for disclosing a conflict of interest.

It is important to note that some situations may arise that are not specifically defined by this policy; however, they must be reported to determine if a conflict of interest exists. All disclosures should be made in writing immediately upon discovery.

Residency training programs may choose to implement a decision-making COI committee with program specific policies and procedures in place to manage potential conflicts of interest effectively at the program level. The COI committee must comply with this policy. Flexibility within existing COI operational procedures and policy at the program level is permitted at the committee's discretion.

COI decisions that cannot be managed appropriately at the program level, will be brought to the attention of the Department/Unit Head.

The COI committee and/or Department/Unit Head is responsible to make decisions regarding the outcome (if any) of disclosed conflicts of interest. It is recommended this be done in collaboration with residency training program leadership (Program Director/Site Director/Residency Program Committee/Competence Committee) whenever possible. COI committees will be responsible for taking immediate and appropriate action when they become aware of violations of the policy.

Should no COI committee exist at the program level, conflicts of interest will be brought to the attention of the PGME Associate Dean.

Conditions or restrictions may be imposed to manage conflicts of interest; conflicts may be reviewed on a case-by-case basis by the PGME office.

Final authority regarding conflict of interest outcomes rests with the PGME Associate Dean.

Procedure:

The following are illustrative of situations, which may lead to a conflict of interest ([see for a comprehensive list](#)):

- A university member has a position or interest in an entity whereby she/he can exercise significant influence in transactions between the entity and the university. University members who are responsible for specifying or approving materials, equipment or

services purchased by the University, must not have any financial interest, either direct or indirect (e.g., a family member, spouse, or friend), in the transaction

- Principal investigators, co-investigators and research personnel accepting ownership shares (free or discounted) in a company with which the university is contracting research services on their behalf
- Involvement in activities that conflict with a commitment to the assigned duties and responsibilities of the member's position with the university
- Acceptance of gratuities, gifts or special favors from entities or individuals with which the university does or may conduct business
- University members in a position to influence the appointment of family members, relatives, and affiliates to positions at the University
- Services performed by university members on their own accord or under the auspices of a company, in which they hold an interest, when the service can be performed through the University or as part of the University member's duties

PGME members who identify an apparent or actual COI must cease the proposed activity immediately and inform the Direct Supervisor, Program Director, or Department/Unit Head for proper management.

PGME members who have disclosed a COI should, in consultation with the COI committee, Department/Unit Head, or PGME Associate Dean resolve the COI, which may require the discontinuance of the activities through which the COI will arise or has arisen.

Should the COI committee, Department/Unit Head or PGME Associate Dean believe a PGME member is involved in a COI, then the COI committee and/or Department/Unit Head/PGME Associate Dean is expected to request full disclosure in writing of the individual's relevant interests or an explanation that no COI exists. The PGME COI disclosure form or the program level COI committee disclosure form may be used.

A PGME member who is considering engaging in activities that may be a COI with respect to their involvement or commitment to the university are required to seek approval in writing (COI Disclosure Form) from their COI committee or Department/Unit Head/PGME prior to engaging in such activities.

All disclosures of a COI must be filed with the PGME member's COI committee, and/or Department/Unit Head, and a copy forwarded to the PGME Associate Dean. The COI committee/Department Head/Unit Head/PGME Associate Dean will review the submitted COI disclosure information, render a decision, and provide direction to the member.

The PGME office may consult with University Legal Counsel, Privacy Office, or Human Resources Office if required.

Situations that cannot be resolved between the PGME member and the appropriate COI committee or Department/Unit Head shall be referred to the PGME Associate Dean. When a COI

exists, the PGME member in question may be requested to relinquish the responsibilities causing the COI.

Program level COI committees must submit an annual summary of all COI for review to the PGME office.

All COI situations will be disclosed and appropriately managed prior to any commitment or expenditure of funds, accepting donations or gifts etc. Researchers may be required to sign a declaration stating all known COI had been declared prior to the University authorizing the release of any research funds and that the researcher commits to notify their respective Department/Unit Head should a conflict arise at a later point.

Non-compliance:

This policy and the [University of Saskatchewan Conflict of Interest Policy](#) are designed to assist the University in the management of COI situations before they arise or when they become known. The University expects that its members will comply fully with its policy, including all requirements for disclosure. Failure to do so may constitute grounds for disciplinary action in accordance with any applicable collective agreement, employment contract, or student academic or non-academic discipline regulations, other applicable disciplinary process.

All instances or concerns of non-compliance with this policy and any PGME specific events should be brought to the attention of the Associate Dean, PGME.

References:

PGME supports the following policies and uses them with permission as a basis for this document. Please refer to them for updated policy information.

- [University of Saskatchewan Conflict of Interest Policy](#)
- [UGME Conflict of Interest During Student Assessment Policy](#)
- [Support on Continuing Medical Education Events from Commercial Sources Policy](#)
- [PGME Conflict of Interest Disclosure Form](#)

Contact:

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