



## Conflict of Interest Information and Guidelines

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The Biology Department, Unit 2, I.K. Barber School of Arts and Sciences, has a responsibility to manage conflict of interest and conflict of commitment. To facilitate understanding of what this involves, see the information below. Please read carefully.

1. UBC policy 97 addresses conflict of interest and conflict of commitment.
  - a. “The existence of a Conflict of Interest or a Conflict of Commitment involves two elements: the UBC Person’s or a *Related Party*’s personal interest(s), and the UBC Person’s obligations to the University. Personal interests may include business, commercial or financial interests, as well as **personal matters and career interests**. A UBC Person’s obligation to the University is to act in the University’s interests, which includes acting in support of the University’s integrity and fundamental mission and avoiding circumstances that may undermine public confidence and trust. The University has many diverse objectives, which include many supporting commitments, goals and actions. From time to time these objectives, commitments, goals and actions may appear to be, or may actually be in conflict with one another. In such cases, the University’s overriding interest is that its activities are undertaken with integrity and in accordance with the highest ethical standards.
    - 1) “*Related Party*” means a UBC Person’s immediate family member (e.g. spouse, partner, child, parent or sibling), or other person living in the same household, any other person with whom the UBC Person shares a *Financial Interest*, either directly or indirectly, or any entity in which the UBC Person has an ownership interest of more than 5%.
    - 2) “*Financial Interest*” means having or having the expectation to receive:
      - a) Greater than a 5% ownership interest in a single entity; or
      - b) Anything with a monetary value exceeding \$5,000 in any one calendar year, including remuneration (e.g. salary, consulting fees, retainers, honoraria, bonuses, gifts, speaker’s fees, advisory board remuneration, finders or recruitment fees), equity interests (e.g. stocks, stock options or other ownership interests), and intellectual property rights (e.g. patents, copyrights, royalties or other payments from such rights).
  - b. “A perceived Conflict of Interest is a situation where an actual or potential Conflict of Interest may or may not exist, but where there may be, nonetheless, from the perspective of a reasonably well- informed, impartial observer, a perception of a Conflict of Interest. This is sometimes referred to as an “apparent” conflict of interest.”
  - c. The mention of potential Human Resources conflicts arise where “a UBC Faculty member is in a position to influence human resource decisions (such as recruitment, offer of employment, evaluation of performance (*merit and PSA*),



- promotion, granting of tenure, or termination of employment) or admission decisions with respect to a person with whom the UBC Person has a relationship that might reasonably be perceived as creating a Conflict of Interest.”
2. Department members who have a real or perceived conflict of interest or commitment must declare this conflict on the COI declaration.
    - a. “Prior to commencing a research project, a UBC Person who is an investigator must disclose all Conflicts of Interest and perceived Conflicts of Interest that may arise in relation to the research project.”
    - b. “Prior to undertaking any activity that may give rise to a Conflict of Interest or a perceived Conflict of Interest, whether or not that activity is within the scope of the UBC Person’s work at the University, a UBC Person must disclose that activity. Where prior disclosure is impossible, disclosure must be made as soon as possible after commencement of the activity.”
    - c. “In addition, at least annually and whenever there is a material change, any UBC Person identified in Section 1.1 of the Procedures to this Policy must disclose circumstances (if any) that give rise to a Conflict of Interest or a perceived Conflict of Interest.”
  3. Role of the Department Head: the Department Head will be asked to approve the COI declarations. If real or potential conflicts of interest or commitment are declared, the Unit Head, in consultation with the faculty member, will develop a management plan that recognizes where the potential for real or perceived conflict might occur, and how to manage the potential conflict.

#### **Conflict of Interest Policy for Biology/Unit 2:**

1. Faculty members who have partners/spouses in our Department must be very careful to ensure that there is no perceived conflict of interest or commitment.
  - a. The partner or spouse of a faculty member will excuse him or herself from any discussion involving appointment, reappointment and promotion and/or tenure regarding their partner/spouse.
  - b. The partner or spouse of a faculty member will also excuse him or herself from any discussion about merit and PSA regarding their partner/spouse.
  - c. For grant applications that require support letters, one spouse or partner should not write a letter of support for the application of the other. Further, when spouses or partners are working jointly on grant applications, they should indicate on the UBCO grant application cover sheet that there is a potential conflict of interest.
2. Faculty members who have partners/spouses in our Department must be very careful to ensure that there is no perceived conflict of interest or commitment with



respect to graduate students or co-supervised graduate students or honors students. Since supervision of graduate students and undergraduate directed studies and honors students is part of what is considered for reappointment, promotion and tenure, and for merit and PSA, it is important that there not be a real or perceived conflict of interest.

- a. If a partner/spouse co-supervises a graduate student, the committee for that graduate student should be expanded to include another faculty member.
  - b. If a partner/spouse sits on the committee for a graduate student, the committee should be expanded to include another faculty member.
  - c. Partners of faculty members supervising graduate students should not sit on the examining committee for that graduate student or on the defense committee.
  - d. Faculty members who have partners/spouses in this Department should not be involved in evaluating applications of students for graduate studies who will have the partner as a supervisor, nor should they evaluate applications for employment at UBC Okanagan, scholarships or fellowships for either graduate students or undergraduate students supervised by their partner.
3. Faculty members who have children or other relatives (husbands, wives, brothers, sisters, nieces, nephews, cousins, permanent wards, close personal friends etc.) who are enrolled as students at UBCO must also be careful that there is no perceived Conflict of Interest or Conflict of Commitment.
- a. If a child or relative is enrolled in biology courses, the faculty member must not communicate with the course instructor about the student's progress or lack thereof.
  - b. The faculty member should not sit on committees that evaluate applications for scholarships, fellowships, awards or offers of employment, if their relative is an applicant.
  - c. If a child or a relative is enrolled in a biology course taught by the faculty member (which can happen in required courses), the faculty member must:
    - 1) Declare this conflict to the Unit Head
    - 2) In consultation with the Unit Head, develop a management plan that includes a list of actions, limits and timelines to reduce or remove any negative impact of a conflict. This will include the establishment of a protocol for grading accommodation based on the evaluation needs of the particular course. This protocol may include the following:
      - a) A marker may be provided to mark all assignments for all students. This is designed to ensure consistency in grading practice across the entire class. Assignments and exams of the child/relative will be handed to one of the Unit Assistants in a sealed envelope to be distributed to the marker.
      - b) If there isn't a TA or marker, the Unit Head may ask another faculty member to mark the assignments and exams of the child/relative based on the key that is used by the faculty member to mark other exams.



- c) In the case of group work, another faculty member may act as an observer and come to class to observe the groups. The faculty member will assign a grade to each group, and the observer will ensure that the marking is consistent.
- d) In the case of a class where expertise is very specialized, the faculty member will mark the assignments/exams, and will provide them to an independent faculty member along with at least 5 exams/assignments from other students in the class who have received similar grades.
- 3) Include in the course outline the following statement: “The Biology Department of UBCO takes seriously any real or perceived conflict of interest, and has a management plan in place to address any situation where a student has a personal relationship with a faculty or staff member. Please see the Department Head if you have any questions or concerns.” (Note: There is no need to specifically identify a student in your class to whom you are related or with whom you have a close personal relationship).
- 4) Provide a neutral third party that the student can go to for help in case of negative reactions from other students in the course.
- 5) Ensure that the child or relative does not have access to more information than any other student in the class such as marking keys, exams, personal information about other students etc. All files kept on a computer used for the course should be password protected. The faculty member should ensure that the child or relative does not have unsupervised access to his or her office at any time.
- 6) The Unit Assistant will compile the marks for the course, and the final mark will be calculated and entered by the Unit Head or the Unit Assistant.