

CONFLICT OF INTEREST AND CONFIDENTIALITY IN THE RESEARCH FUNDING PROCESS

CATEGORY, SCOPE, AND AUTHORITIES		KEY DATES	
Policy category:	Operational	Approval:	October 2024
Functional area:	Research	Effective:	Upon approval
Applies to:	Staff, Volunteers	Revision frequency:	3 years
Approval Authority:	Leadership Team	Last review:	n/a
Executive Champion:	CEO	Next review:	2027

1. RATIONALE

Integrity is one of the core values of Ovarian Cancer Canada (OCC) and must guide all actions of its staff and volunteers. To maintain a high level of public support, trust and respect it is essential that the affairs and business of OCC – of which research funding is a core area -are conducted professionally, objectively and without interference from the personal interests of the individuals involved in making decisions for, or acting on behalf of, the organization. OCC adheres to the standards established by the Government of Canada with respect to Conflict of Interest and confidentiality in the research funding process.

2. OBJECTIVE

This policy aims to ensure the integrity of Ovarian Cancer Canada’s research funding process. Specifically, this policy aims to ensure:

- The confidentiality of information submitted to OCC or shared among funding organizations; including all information and decisions about research funding applications submitted, collected, prepared or made in connection with OCC’s research funding program.
- The effective management of Conflict of Interest of any participant in the research funding review process, so that OCC research funding decisions are fair, objective and free of actual, perceived or potential Conflict of Interest.

3. SCOPE

This policy applies to all staff and volunteers participating in the OCC research funding application submission, review and adjudication process. This includes but is not limited to staff, Research Advisory Council, independent academic reviewers, patient reviewers, review panel Chairs, partner organizations, observers and others.

4. POLICY DETAILS

1. CONFIDENTIALITY

- 1.1. Confidential Information includes but is not limited to: a) the names of individuals and organizations who have applied for funding; b) the names of individuals and organizations denied funding or otherwise withdrawn from the funding process; c) information contained in applications and related materials; d)

reviewer reports, names of reviewers for each application and panel discussions; and e) information contained in complaints or appeals.

- 1.1.1. Confidential Information does not include the names of Applicants and organizations that have been granted funding under the OCC research funding program once that information has been made public by OCC or the organization that has been granted funding.
 - 1.2. The information provided by Applicants in their applications is made available to Reviewers for assessment purposes only. Reviewers must take reasonable care to protect Confidential Information from theft or unauthorized access. Reviewers will comply with all guidelines or procedures established by OCC with respect to security and protection of Confidential Information. Reviewers shall not use Confidential Information for their personal benefit or for the benefit of any organization with which they are associated.
 - 1.3. Reviewers will keep Confidential Information confidential and will not disclose Confidential Information except to other Review Panel members, members of the OCC Research Advisory Council and employees, officers, volunteers, advisors and partner organizations who have a need to know such Confidential Information in connection with the operation of OCC's research program.
 - 1.4. Reviewers shall not discuss with Applicants, or anyone outside of OCC and its funding partners, any information relating to the review of a specific application or offer opinions on the chances of success or failure.
 - 1.5. Applicants must not contact Reviewers, the Chair of the Review Panel and Research Advisory Council members, regarding the status of their applications. All requests for information should be referred to OCC staff.
 - 1.6. Applicants are entitled to feedback on their submissions. Therefore, OCC will provide each applicant with a report from the Review Panel on the evaluation of its application. Such a report will not attribute the comments of individual Review Panel members, nor identify the Lead Reviewers or Readers involved in the evaluation of the application. However, a list of Review Panel members may be published on the OCC website.
 - 1.7. On termination of a Reviewer's engagement as a member of the Review Panel, or at any other time upon request of OCC, a Reviewer will securely destroy any documents, materials and electronic records in their possession or control containing or reflecting any Confidential Information and shall not retain copies of any of them.
 - 1.8. The obligations regarding Confidential Information will survive the expiration or ending of a Reviewer's term with OCC.
2. CONFLICT OF INTEREST
- 2.1. An individual cannot be involved in the Review Process of an Application if they are in Conflict of Interest.
 - 2.2. Reviewers will be considered to have a Conflict of Interest if a Reviewer's personal interests, or the interests of an organization with which they are associated, conflict with their duties as a Reviewer.
 - 2.2.1. A Reviewer is considered to have a Conflict of Interest with an application if they:
 - Have funding-decision authority for the funding opportunity.
 - Are a principal Applicant, co-Applicant or collaborator on an application in the funding competition.

2.2.2. Other circumstances that may constitute a Conflict of Interest for Reviewers include:

- Is an individual(s) from the same department as the Applicant.
- Is a student or supervisor of the Applicant within the past 10 years.
- Is a current collaborator of the Applicant, has co-published with the Applicant within the past 5 years, or is collaborating on a pending grant or manuscript in preparation.
- Is a close friend or relative of the Applicant.
- Has been identified by the Applicant as having long-standing professional or personal differences with the Applicant.
- Can gain or lose financially from the outcome of the application.
- For some other reason feels that they cannot provide an objective review of the application.

2.3. All Participants in the Review Process must disclose to OCC in writing any actual or potential Conflict of Interest with the applications in the competition. Reviewers must disclose to OCC the facts and circumstances that might reasonably be regarded as creating an actual, perceived or potential bias or Conflict of Interest in the performance of their duties as Reviewer.

2.4. Applications will be assigned to Reviewers to ensure a fair and impartial review by avoiding a declared Conflict of Interest.

2.5. Reviewers with a declared Conflict of Interest must be absent and not participate in any discussions or decisions regarding a review for which they are conflicted.

2.6. The Review Panel Chair is responsible for resolving areas of uncertainty arising during a Panel meeting and for making final decisions as to whether a Reviewer must withdraw from participation in any review and may refer issues arising to OCC staff or the Research Advisory Council.

2.6.1. In the event the Chair has a Conflict of Interest with respect to a specific application, the Chair will withdraw from review and discussion of that application and the Review Panel will select a temporary chair from amongst its members for the purposes of that application.

2.7. All Reviewers must read and agree to abide by the Terms of Reference of the respective review panel and this Confidentiality and Conflict of Interest Policy prior to receiving access to any application information.

2.8. Any breach of this Policy may result in a review of the matter, with OCC reserving the right to take appropriate action including, but not limited to, the removal of the Reviewer from serving on the review panel and/or OCC committee(s).

2.9. Review Process Participants must read and confirm in writing that they agree to comply with the provisions of this Confidentiality and Conflict of Interest Policy by signing the Declaration of Understanding and Compliance with Organizational Policies

5. RELATED DOCUMENTS

The following internal and external documents support the application of this policy:

- a. Procedures, forms, guidelines, and other resources:
 - Declaration of Understanding and Compliance with Organizational Policies form
- b. Related organizational policies
 - [Conflict of Interest policy](#)
- c. Applicable legislation and regulations:

- [Government of Canada Interagency Research Funding policy on Conflict of Interest and Confidentiality](#)

DEFINITIONS

Applicant: An individual or individuals acting as principal applicant(s) on a research funding application to an OCC funding competition.

Confidential Information: Information about Applicants, including names, application content, reviewer reports, and panel discussions.

Participant: Anyone involved in the review process, including review committee members, partner organizations, and observers.

Conflict of Interest: A situation where a Participant's duties and responsibilities in the review process conflict with their personal, professional, business, or public interests. There may be a real, perceived or potential Conflict of Interest when the Participant:

- Would receive professional or personal benefit resulting from the funding opportunity or application being reviewed;
- Has a professional or personal relationship with an Applicant or the Applicant's department; or
- Has a direct or indirect financial interest in a funding opportunity or application being reviewed.

Reviewer: Individuals with relevant professional and/or personal expertise to provide a critical assessment of applications, in writing and verbally. They are members of the Review Panel.

Review Panel: A group responsible for evaluating applications against the funding opportunity evaluation criteria and for making funding recommendations to the appropriate authority.

Review Process: Conducting application reviews to provide funding recommendations and then arriving at the final funding decisions.

Leadership Team (LT): The most senior level of staff leadership within OCC comprised of the Chief Executive Officer (CEO) and Vice Presidents. The CEO may alter the composition of the LT as required from time to time. One person may hold more than one position. Titles may change at the discretion of the LT or the Board.

Executive Champion: A member of the LT with overall responsibility for an assigned policy including: drafting, carrying out appropriate consultations / assessment, evaluating implications of the policy including risks and costs and seeking legal advice where necessary, developing and carrying out the communication, change management and implementation plan, writing any related procedures, standards or guidelines, monitoring compliance through regular reviews of the policy and reporting to the approval authority on compliance with the policy. The Executive Champion may designate a delegate, who must be named.

POLICY HISTORY

Include a record of all changes to the policy and their approval dates.

Date	Type of review	Comments
Aug 2024	New policy development	
Oct 2024	Policy approval by LT	