

Conflict of Interest: Review and Management Guide

1. **DISCLOSURE FORM** complete in its entirety:
 - a. Form is to be completed by all faculty and staff at the Director level and above, as part of the Conflict of Interest Compliance Program. Going forward, annually on October 15th, an e-mail notification will be sent to employees with instructions to complete the annual *Conflict of Interest/Conflict of Commitment Declaration & Disclosure Form* online.
 - b. Form which indicates a response of “no” to all questions will require no further action and will be maintained in the Shark Talent Learning Management System.
 - c. Form which indicates “yes” to any actual, potential, or perceived conflict(s) will be subject to further review by the Dean or Vice President.

2. **REVIEW OF DISCLOSURE**
 - a. Ensure the disclosure form is complete, and you have enough information to make a determination of a potential/perceived or actual conflict of interest/commitment.
 - b. Determine if conflict(s) exist based on category (i.e. not significant and generally permissible; potential or perceived; actual conflict).
 - **Not Significant and Generally Permissible** - Activities that are permissible because they do not compromise or appear to compromise the judgment, loyalties and time commitment of employees, the integrity of faculty and student interactions, the objectivity of research results, or other interests of the University, the sponsor, or the public.
Action: No further follow-up is required.
 - **Potential or Perceived Conflicts of Interest/Conflicts of Commitment** - Activities that may be permissible following full disclosure and that can be managed in accordance with appropriate University policies, to ensure institutional integrity, academic standards, and intellectual value.
Action: Management Plan is required.
 - **Actual Conflicts of Interest/Conflicts of Commitment** - Activities that are prohibited because they are in conflict with University policy or otherwise compromise the judgment, loyalties and time commitment of employees, the integrity of faculty and student interactions, the objectivity of research results, or other interests of the University, the sponsor, or the public.
Action: Actual conflict(s) of interest and/ or commitment must cease and desist.

3. MANAGEMENT PLAN

- a. Management Plan requires acknowledgement statement of employee’s potential, or perceived conflict(s).
- b. Management Plan will outline measures to manage conflict(s) in accordance with appropriate University policies, to ensure institutional integrity, academic standards, and intellectual value.
- c. Faculty and staff at the Director level and above must **immediately** disclose to their Dean or Vice President a change in the status of an existing perceived/potential conflict, or the identification of a new actual or perceived/potential conflict of interest or conflict of commitment.
- d. Management Plan is reviewed during each annual disclosure process, and updated if necessary. Immediate supervisor is responsible for oversight of the management plan.

* See chart below for general designation of appropriate reviewer:

| Disclosed by: | Reviewer | Management Plan Approval |
|--|--|--|
| Faculty | Dean | Dean |
| Director, Managing Director, Executive Director | Dean or Vice-President | Dean or Vice-President |
| Dean | Provost | Provost |
| Direct Reports of Executive Vice President/Chief Operating Officer | Executive Vice President/Chief Operating Officer | Executive Vice President/Chief Operating Officer |
| Direct Reports of the President | President | President |
| President | Chair of Board of Trustees | Chair of Board of Trustees |