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Parent Policy: Conflict Policy – Conflict of Interest and Commitment and Institutional Conflict

PGME Conflict of Interest Guidance Document

Office of Accountability:	Faculty of Medicine & Dentistry (FoMD)
Office of Administrative Responsibility:	Postgraduate Medical Education (PGME)
Approver:	Postgraduate Medical Education Committee (PGEC)
Classification:	Governance and Administration
Scope:	Residency and Area of Focused Competence (AFC) Programs

Overview

In accordance with the University of Alberta’s Conflict of Interest and Conflict of Commitment Reporting and Assessment Procedure, a staff member that engages in an activity or situation that involves either existing or potential conflict shall report the conflict so that it may be assessed and, where appropriate, managed. There is a need for a guidance document to advise members of the PGME community on how to navigate situations involving conflict of interest in the postgraduate medical education context. This is also enshrined in the General Standards of Accreditation for Institutions with Residency Programs set by the Canadian Residency Accreditation Consortium (CanRAC). The following institutional accreditation standards apply:

2.1.1.2: The appropriate identification and management of conflicts of interests for all individuals with responsibility in residency programs are addressed within applicable central policies and procedures.

Members of the PGME community often fulfill multiple roles, and real or perceived conflicts of interest may arise. To ensure the appropriate management of real or perceived conflicts, members of the PGME community must disclose any relationships, contracts, transactions or activities, whether existing or proposed, that would create, or appear to create, a conflict of interest. While all possible situations are too numerous to list, conflicts of interest may arise while members of the PGME community engage in the following types of activities:

- resident application and selection.
- teaching and assessment.
- educational programming.
- assignment of educational resources.
- clinical work.
- governance, leadership, or administration.
- committee work.
- interactions with industry or other third parties.
- other activities related to postgraduate medical education.

Purpose

This guidance document, applying the principles outlined in the University of Alberta's Conflict Policy – Conflict of Interest and Commitment and Institutional Conflict, outlines the process by which members of the PGME community should report conflict of interest, reduce the chance of conflict of interest or potential conflict of interest, and appropriately manage existing conflict of interest. In situations where there is a real or potential conflict of interest involving interactions with industry, refer to the FoMD's Interactions with Industry Policy and FoMDs' Interactions with Industry Q & A document for guidance.

PROCESS

1. REPORTING A CONFLICT OF INTEREST

- a. A person engaged in or with knowledge of a situation involving existing or potential conflict of interest shall report it to the administrative leader in that context or, if applicable, other group members.
 - i. Examples of administrative leaders to whom conflict of interest should be reported may include a committee member reporting to the rest of the committee and the committee chair, a subcommittee chair reporting to the chair of the overarching committee, residents or teaching faculty reporting to the Residency or AFC Program Director, a Residency or AFC Program Director reporting to the PGME Associate Dean, or the PGME Associate Dean reporting to the Education Vice Dean of FoMD or designate.
 - ii. Simply knowing, or previously working with, another person or group of people in one context does not necessarily constitute a conflict of interest in another context. Rather, the degree of compromise on a person's judgment, decisions, or actions due to personal gain should be considered.

2. MANAGING THE CONFLICT OF INTEREST

- a. The person engaged in a situation involving existing or potential conflict of interest should collaboratively work with the administrative leader to manage the conflict. In general, solutions may include the following:
 - i. the situation may be acknowledged and deemed to lack a conflict of interest and no specific action is required.
 - ii. the existing or potential conflict of interest can be mitigated while the person continues in the role or situation.
 - iii. the existing or potential conflict of interest cannot be adequately mitigated and the person needs to temporarily or permanently vacate the role or situation.

3. ADVICE OR ADJUDICATION

- a. The Associate Dean, PGME, can be contacted if reporting a conflict of interest or further advice or adjudication is needed regarding the existing or potential conflict of interest or its management.

DEFINITIONS

Definitions are listed in the sequence they occur in the document (i.e. not alphabetical).

Any definitions listed in the following table apply to this document only with no implied or intended institution-wide use.	
Conflict of Interest	A conflict of interest is a potential, apparent or actual conflict where an individual's private, professional, business or public interests, whether direct or indirect, conflicts or appears to conflict with that individual's responsibility to the University. Note that merely knowing an individual or working with an individual in the past, in itself, does not necessarily constitute a conflict of interest.