

Mitacs Conflict of Interest Policy

Conflict of Interest Policy – Program Participants

1. What is a conflict of interest?

A conflict of interest (COI) is a situation in which an individual has competing interests or loyalties that could potentially affect their decision-making.

A COI is a situation, not an accusation. Being in a COI is not the same as being corrupt, and pointing out that someone is in a COI is not the same as accusing them of bias or lack of integrity.

A COI, if not dealt with properly, may leave doubt about the objectivity of a decision-making process, or about the integrity of the research project.

Being in a COI does not necessarily bar you from participation in a Mitacs program. Mitacs reviews each situation to see if the COI can be managed, and how.

2. Is it a COI if the academic supervisor has a position of ownership, employment, or influence over the daily operations at the partner organization?

Academic supervisors who have a position of ownership, employment, or influence over the daily operations of a partner organization are in a COI. In such cases, the individual's responsibilities to their academic institution and their students may conflict with their responsibilities to the partner organization. Whenever there is potential for such COIs to occur, the COI must be disclosed to Mitacs.

3. Is it a COI if the student/postdoctoral fellow has a position of ownership, employment, or influence over the daily operations at the partner organization?

Students/postdoctoral fellows who have a position of ownership, employment, or influence over the daily operations at the partner organization are in a COI. Such conflicts must be disclosed to Mitacs.

Besides the COI, such cases may be disqualified by the eligibility rules for certain Mitacs programs. For example, Accelerate interns are normally not allowed to be employees of the partner organization at the time they undertake their internship. Mitacs may grant exceptions in some cases; in general, each situation is reviewed individually.

One broad exception is the Mitacs Accelerate Entrepreneur program. In this program, student/postdoctoral entrepreneurship and ownership of the partner organization is a core

element so the intern cannot be disqualified based on ownership/employment/influence at the partner organization. However, the COI must still be disclosed to Mitacs.

4. Is it a COI if program participants have a close family relationship or intimate relationship with each other, or with someone in a position of ownership, employment, or influence at the partner organization?

If program participants have a close family relationship or an intimate relationship with each other, Mitacs considers this a COI.

If an academic supervisor or student/postdoctoral fellow has a relationship with the partner organization – for example, if a close relative has a position of ownership, employment, or influence at the partner organization – Mitacs treats this as a COI.

Each situation is reviewed individually. Normally, Mitacs will not support an internship where the intern is related to an individual at the partner organization who makes or could influence hiring decisions.

5. How does Mitacs determine the management of a COI?

Academic supervisor-related COIs:

Mitacs requires the following information from the academic supervisor:

- * Details on the nature of the supervisor's COI;
- * Evidence that the supervisor's academic institution is aware of the COI; and
- * A description of the academic institution's mitigation measures.

When the COI is considered low, generally Mitacs will not require any mitigation measures beyond those of the academic institution.

When the COI is higher, Mitacs may require measures beyond those imposed by the academic institution, including requesting that the academic institution appoint an independent administrator to be responsible for managing the grant and ensuring the financial, intellectual property, and intern academic matters of the project comply with the academic institution's policies. The administrator would also be responsible for ensuring the intern is not unduly influenced by the academic or partner organization supervisors and would provide a declaration that they will act in the best interests of the intern participating in the project. (Note that an independent administrator will always be required when there is an academic supervisor COI related to projects under the Entrepreneurship Initiative.)

When the COI is considered unmanageable by the academic institution, Mitacs will not support the project.

Intern/postdoctoral fellow-related COIs (except Accelerate Entrepreneur Initiative):

Mitacs requires that interns disclose the details on the nature of the COI by completing the Mitacs Intern Conflict of Interest Declaration Form.

- * Mitacs will first determine if program eligibility rules are satisfied.
- * If so, Mitacs will then review the COI to determine if it is considered unmanageable according to precedent.

Intern/postdoctoral fellow-related COIs – Accelerate Entrepreneur Initiative:

Mitacs requires that interns disclose the details on the nature of the COI by completing the Mitacs Intern Conflict of Interest Declaration Form.

Three requirements must be in place to manage the COI associated with the intern's ownership/employment/influence at the partner organization:

- * The academic institution must be informed and agree that they recognize that the COI is occurring with this particular project;
 - * The academic supervisor must acknowledge they are aware of the COI and agree to help mitigate it through their supervision; and
 - * The incubator where the student is working must acknowledge being aware of the COI and agree to help mitigate it through oversight in the place of a partner organization supervisor.
- * Mitacs will also review any additional COIs and determine if those are considered unmanageable according to precedent.

Projects with Indigenous participants, communities, or organizations:

Mitacs is aware that projects with Indigenous participants, communities or organizations may require different COI mitigation measures to respond to cultural protocols, needs, and interests.

6. Who is responsible for reviewing COIs at Mitacs?

Ultimate responsibility for implementation and management of the Mitacs Conflict of Interest-Program Participant Policy rests with the Mitacs Board of Directors. The Mitacs Governance Committee has been charged with establishing controls to both monitor and manage COI. The Governance Committee has delegated the review of certain types of COI to the Staff Committee, headed by a member of the Executive Management Team, and to the Mitacs Research Council (MRC). All COI decisions are presented to the Governance Committee and the Board of Directors at their regular meetings.

In certain circumstances, the Mitacs Board of Directors may arrange for an independent third party, appointed by mutual agreement of Mitacs and the Board of Directors, to act as an intermediary to scrutinize scientific reports and budgetary information of research project(s) in which the individual participating in the Mitacs program is involved. The intermediary would provide an opinion on the overall merit of the review, without divulging specifics of a proprietary nature to other members of Mitacs.

7. Who does a program participant discuss a potential COI with?

Individuals unsure as to whether a certain situation constitutes a COI should contact a Mitacs Business Development Director/Specialist or a Program Director. An individual may also request in writing to the persons above, within 30 days, a review of Mitacs's decision on a COI.

8. What happens when I am in a conflict of interest and have not made the appropriate disclosures?

If a program participant is discovered to be in COI of interest where disclosure and prior approval have not been sought or granted, the Mitacs Board of Directors will require the individual to:

- * Mitigate the COI immediately to Mitacs' satisfaction; or
- * Withdraw from the Mitacs program.