



Mitacs Conflict of Interest Policy for Program Participants

APPROVED BY BOARD OF DIRECTORS: SEPTEMBER 2024



CHANGE LOG

Date of update	Board approval	Updated by	Description of update
June 2024	September 2024	Henry Ling, Vice President, Research	Reorganized all sections and thoroughly revised text for clarity. Added examples that illustrate current COI practices at Mitacs. Added points related to situations involving other research funding organizations. Added points on current and past public servants and public office holders. Updated table of roles and responsibilities.
June 2021	July 2021	Henry Ling, Vice President, Research	Added conflict for projects with Indigenous participants, communities, methodology, content or partners.
January 2021	March 2021	Henry Ling, Vice President, Research	Updated language to be more inclusive. Added conflict for familial relationship. Added intern/partner organization relationship.
June 2018	July 2018	Allison Grose, Director, Risk & Compliance	Revision of all sections related to conflicts by the professor/academic supervisor. Change “university” to “academic institution”. Change “company” and “host organization” to “partner organization”. Change “professor” to “academic supervisor”. Removal of term “pilot” when referring to the Accelerate Entrepreneur initiative.
November 2016	November 2016	Allison Grose, Manager, Risk & Compliance	Inclusion of special provisions related to the pilot Mitacs Accelerate Entrepreneur initiative related to academic supervisor ownership of the host organization, including: <ul style="list-style-type: none"> Last paragraph, Section 3, p. 7 Centre section of p. 10 (Section 8).
June 2016	July 2016	Allison Grose, Manager, Risk & Compliance	Inclusion of special provisions related to the pilot Mitacs Accelerate Entrepreneur initiative related to student ownership of the host organization, including: <ul style="list-style-type: none"> Last paragraph, Section 4, p. 6 Centre section of p. 8 (Section 8).
July 2015	July 2015	Allison Grose, Manager, Risk & Compliance	
February 2012	March 2012	Manager, Research Grant Management	

TABLE OF CONTENTS

1.0 Objectives..... 4

2.0 Scope..... 4

3.0 Policy 4

4.0 Roles and Responsibilities 8

Mitacs Conflict of Interest Policy for Program Participants

1.0 Objectives

The objectives of the Mitacs Conflict of Interest Policy for Program Participants are:

- to enable Mitacs program participants to recognize and disclose conflicts of interest, and
- to ensure that such conflicts of interest are appropriately managed and ensure consistency in the measures taken.

2.0 Scope

This Policy covers the following:

1. What is a conflict of interest (COI)?
2. What are some examples of COIs?
3. What COIs should be disclosed to Mitacs?
4. How does Mitacs determine the management of a COI?
5. What happens if a COI has not been disclosed to Mitacs?

3.0 Policy

3.1. WHAT IS A CONFLICT OF INTEREST (COI)?

A conflict of interest (COI) is a situation in which an individual has competing interests or loyalties that could potentially affect their decision-making. It is worth noting how broad the concept is. A COI is not just about money; it is about the presence of factors – actual, potential, or perceived – that a reasonable person might think are likely to bias a decision-maker's judgment.

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 a research project.

Being in a COI does not necessarily disqualify you from participating in Mitacs programs, but you should disclose the COI to Mitacs because the first guardian of the required ethical behaviour in

the event of a COI (actual, potential, or perceived) is the individual involved. Mitacs reviews each COI to determine if and how it can be managed.

3.2 WHAT ARE SOME EXAMPLES OF COIs?

Examples of COIs involving Mitacs program participants:

- An academic supervisor has or had a position of ownership, employment, or influence over the daily operations of a partner organization.
- An academic supervisor has or had a close family relationship or intimate relationship with someone in a position of ownership, employment, or influence at the partner organization.
- An academic supervisor is a co-founder of the partner organization.
- An intern is a co-founder of the partner organization.
- An intern/postdoctoral fellow has a close family relationship or intimate relationship with their academic supervisor.
- An intern/postdoctoral fellow has or had a position of ownership, employment, or influence over the daily operations of a partner organization.
- An intern/postdoctoral fellow has or had a close family relationship or intimate relationship with someone in a position of ownership, employment, or influence at the partner organization.

3.3 WHAT COIs SHOULD BE DISCLOSED TO MITACS?

All COIs listed in section 3.2 should be disclosed to Mitacs. Note that this list of examples is not an exhaustive list of COIs. In general, the use of good judgment, based on high ethical standards and transparency, should guide all program participants with respect to acceptable conduct and COI disclosure.

Current or former public servants or public office holders who seek to participate in Mitacs programs must disclose this situation to Mitacs.

An academic supervisor in a COI should disclose the situation by completing the [Mitacs Academic Institution Acknowledgement Form](#) or by submitting a completed copy of their academic institution's conflict of interest declaration form. In either case, the disclosure should provide details on the nature of the COI, evidence that the academic institution is aware of the COI, and a description of the academic institution's COI management measures.

An intern/postdoctoral fellow in a COI should disclose the situation by completing the [Mitacs Intern Eligibility and Conflict of Interest Declaration Form](#) or the [Mitacs Accelerate Entrepreneur COI Declaration Form](#), as appropriate.

All COIs should be disclosed to Mitacs when submitting a new Mitacs application, even if the COI has been disclosed on a previous Mitacs application or if it has already been disclosed to other research funding organizations. If an individual's situation changes during the Mitacs grant, they are responsible for submitting an updated COI disclosure to Mitacs.

3.4 HOW DOES MITACS DETERMINE THE MANAGEMENT OF A COI?

Academic supervisor-related COIs.

For a COI involving an academic supervisor, Mitacs will first confirm that the academic institution is aware of the COI and has put measures in place to manage the COI. If Mitacs agrees that the academic institution's COI management measures are satisfactory, no further action is necessary. In some cases, Mitacs may require additional measures to manage the COI, beyond those put in place by the academic institution. Each situation is reviewed and assessed on a case-by-case basis.

Many COIs involving academic supervisors may be managed to the satisfaction of Mitacs by having the academic institution appoint an independent administrator to the project. In these situations, the academic supervisor remains in this position on the project but cannot hold the Mitacs grant for the project; instead, the independent administrator is responsible for managing the grant and ensuring the financial, intellectual property, and intern/postdoctoral fellow academic matters of the project comply with the academic institution's policies. The independent administrator is also responsible for ensuring the intern/postdoctoral fellow is not unduly influenced by the academic supervisor in COI and must declare that they will act in the best interests of the intern.

Examples of COIs that may be managed by the appointment of an independent administrator:

- The academic supervisor is a co-founder of the host organization.
- The academic supervisor is the Chief Science Officer at the host organization, a spin-off company based on research discoveries by the academic supervisor.
- The academic supervisor has minority ownership in the host organization, a startup company based on the PhD research of the interns (e.g. within Accelerate Entrepreneur).
- The academic supervisor is a member of the host organization's Board of Directors, an operational board that participates in day-to-day operations and activities.

- The host organization is a hospital-based research institute, and the academic supervisor is the director of the unit at this institute that is hosting the intern.

Intern/postdoctoral fellow-related COIs.

For many COIs involving interns or postdoctoral fellows, Mitacs must consider not only the manageability of the COI, but also whether the situation is allowed given the eligibility rules of the Mitacs program and the broader objectives of Mitacs.

For example, consider the following COI:

- An intern/postdoctoral fellow has a position of ownership, employment, or influence over the daily operations of a host organization.

This situation is not normally allowed according to the eligibility rules of the Accelerate program. However, this is allowed within the Accelerate Entrepreneur stream, which is specifically aimed at encouraging entrepreneurship and commercialization of research. To manage this COI in the context of Accelerate Entrepreneur:

- a) The academic institution must be informed and agree that they recognize that the COI exists with this project.
- b) The academic supervisor must acknowledge they are aware of the COI and agree to help mitigate it through their supervision.
- c) The incubator where the intern 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.

As another example, consider this COI:

- An intern/postdoctoral fellow has a close family relationship or intimate relationship with someone in a position of ownership, employment, or influence at the partner organization.

This situation is not normally allowed as Mitacs aims to promote equitable access to internship opportunities. However, Mitacs also acknowledges that, in some contexts involving Indigenous participants and communities, this approach may create unintended barriers and so a different approach may be needed in these contexts to ensure the project proceeds in a good way.

In general, for a COI involving an intern/postdoctoral fellow, Mitacs will first confirm that eligibility rules are satisfied. Mitacs will then determine if the COI is manageable, and if so, what measures are required to manage the COI. Each situation is reviewed and assessed on a case-by-case basis.

Other considerations.

In some cases, the Mitacs grant partially supports a project that is also supported by other research funding organizations. Mitacs program participants must not be in a COI deemed unmanageable by Mitacs and must satisfy any COI management measures deemed necessary by Mitacs, in addition to any other COI requirements from other research funding organizations.

Current or former public servants or public office holders may not be allowed to participate in Mitacs programs. Each situation is reviewed and assessed on a case-by-case basis.

3.5 WHAT HAPPENS IF A COI HAS NOT BEEN DISCLOSED TO MITACS?

If a program participant is discovered to be in a COI that has not been disclosed to Mitacs, Mitacs reserves the right to require that the individual:

- Take steps to manage the COI to the satisfaction of Mitacs, or
- Withdraw their participation in the Mitacs program.

Failure to disclose a COI when submitting a Mitacs application may also result in the delay of the outcome for the application.

4.0 Roles and Responsibilities

ROLES	RESPONSIBILITIES
All Mitacs Program Participants	Review and comply with the Policy.
Mitacs Advisors	Review the Policy and discuss with individuals interested in participating in Mitacs programs.
Mitacs Conflict of Interest Committee	Review COI disclosures and make recommendations or decisions based on the Policy and the advice of the MRIC. Regularly present and report to the MRIC on all COI disclosures reviewed.
Mitacs Research & Innovation Council (MRIC)	As directed by the Mitacs Board of Directors, apply the Policy, and determine measures to manage COIs, as applicable. Review the regular reports from the Mitacs Conflict of Interest Committee on all COI disclosures reviewed.
Mitacs Board of Directors	Review and approve the Mitacs Conflict of Interest Policy for Program Participants.