



<b>Policy</b>	PGME Committees and Conflict of Interest
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<b>Approved By</b>	Postgraduate Medical Education Committee
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<b>Responsible Portfolio/Unit/Committee</b>	Postgraduate Medical Education
<b>Responsible Officer(s)</b>	Associate Dean, Postgraduate Medical Education

## Preamble

The purpose of the Policy is to define in detail, Postgraduate Medical Education’s (PGME) position on actual, perceived, or potential conflicts of interest for faculty who participate on committees in support of postgraduate medical education. The Policy will outline the required procedures to mitigate any risks associated with conflicts in interest within the functions of the committee.

Further, this document is a guide for programs to use when implementing a program specific policy and procedure for their own Residency Program Committee, Postgraduate Education Committee, Competence Committee and/or other committees and subcommittees as needed.

## Scope

This policy applies to members of the Postgraduate Medical Education committee (PGMEC) through their function on the committee or in any of the subcommittees of PGMEC.

Conflicts of interest with industry and financial gain are outlined in [Faculty of Health Sciences, Policy on Conflict of Interest in Interactions with Industry](#) and are appended at the end of this document.

Further, this policy is intended to be consistent with, and complementary to, other policies and collective agreements that govern the conduct of members of the Faculty of Health Sciences at Queen’s University.

## Definitions

**Conflict of Interest (COI):** A conflict of interest may be actual, potential, or perceived.

**Actual conflicts of interest:** Arise where there is a real conflict between an individual acting as faculty member or committee member, and their duties and private interests.

**Bias:** Unconscious bias is an implicit association or attitude-about race or gender, for example that operates beyond our control and awareness; informs our perception of a person or social group; can influence our decision-making and behaviour toward the target of the bias.

**Potential conflicts of interest:** this refers to circumstances where it is foreseeable that a conflict may arise in future and steps should be taken now to mitigate that future risk.

**Perceived conflicts of interest:** arise when a third party or members of the public form the view that one's private interests could improperly influence their decisions or actions, now or in the future.

It occurs when a financial or personal interest of a FHS member or his/her family member, may compromise, or have the potential to compromise, or create the perception of compromising, the individual's professional judgment or integrity and independence in clinical responsibilities, teaching, conducting, research, or performing other obligations as required by their employment agreement (FHS Policy on COI, pg. 5).

A faculty member's personal interest conflicts with their responsibilities to the University, when:

- a. Existing in an advisory capacity as a committee member wherein there is a potential or perception that a financial, industry or personal conflict of interest may arise or exist. (See: Appendix; FSH Policy on COI, pg. 5).
- b. Existing in a committee role that assesses or evaluates the academic and/or clinical performance of a trainee, or policies related to residents in general, wherein an established personal relationship\* exists, has recently existed, or has the perception or potential to exist (e.g., familial relationships).
- c. Any other relationship, membership or financial or industry affiliations that could be seen by a reasonable, well-informed participant as to having the potential to influence the matters of the committee or educational activity.

## Procedures

A faculty member has an obligation to disclose, as soon as they can reasonably be aware, that an actual, potential, or perceived conflict exists. In reflecting on whether or not a conflict exists, faculty members must be mindful of how an implicit or explicit bias may be contributing to any real, perceived, or potential conflict of interest.

A Conflict-of-Interest Disclosure (COI-D) will be a standing item ahead of the approval of the agenda and minutes on every PGME committee or subcommittee meeting agenda. The policy and procedures



document will be appended to every committee or subcommittee meeting agenda and distributed in advance to allow members sufficient time to consider their own potential for conflicts.

The committee Chair is obligated to address the COI-D agenda item and provide members with the opportunity to declare any actual, potential, or perceived personal relationship\*, financial or industry conflicts that may occur during the meeting.

If no declarations rise, it shall be recorded in the official minutes.

If a declaration is made, the committee will be asked to consider the declaration and determine if the member should be recused from the discussion and decision-making process for the item under consideration. The details of the declaration, and resolution for the disclosures are to be formally noted in the committee's official meeting minutes.

\*A close, personal relationship is defined, but not limited to the following:

- Relationships with family members including:
  - Wife, husband, former wife, husband, intimate partners, former intimate partners, parent, stepparent, siblings, children, stepchildren, aunts, uncles, cousins, grandparents, grandchildren
- Personal relationships outside of the workplace including, clubs, religious organizations, sporting teams, neighbours, professional organizations

## References:

College of Family Physicians of Canada. (2018). [Conflict of interest policy](#)

Field, M. J., & Lo, B. (Eds.). (2009). Conflict of interest in medical research, education, and practice.

Royal College of Physicians and Surgeons of Canada. (2007). [Royal College policy on conflict of interest- \(competing interests\)](#).

Queen's University, University Secretariat and Legal Counsel. (2001). [Conflict of interest and conflict of commitment policy \(Faculty\)](#).

Queen's University, Faculty of Health Sciences. (2017). [Faculty of Health Sciences policy on conflict of interest in interactions with industry](#).

APPENDIX A

[FACULTY OF HEALTH SCIENCES POLICY ON CONFLICT OF INTEREST IN INTERACTIONS WITH INDUSTRY](#)