

 DALHOUSIE UNIVERSITY Health Data Nova Scotia Conflict of Interest Policy	Author: S.Kennedy	Review Date: 01.01.2018
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1. BACKGROUND & PURPOSE

- 1.1 Health Data Nova Scotia (HDNS) staff, contractors, and/or members of the Data Access Committee engaging in research activity using data held by HDNS raises the possibility of a conflict of interest.
- 1.2 The purpose of this policy is to delineate the roles, responsibilities and process for the identification, elimination, minimization or management of perceived, potential, or real conflicts of interests.

2. APPLICATION

- 2.1 This policy applies to researchers, or health service assessment analysts - referred to as requestor(s) - and HDNS staff, contractors and members of the HDNS Data Access Committee (DAC), referred to as HDNS associates.

3. DEFINITIONS

- 3.1 *Conflict of Interest:* A conflict between a person's duties and responsibilities as a requestor(s) or HDNS associate and that person's professional, business, personal / familial or public interests. Conflicts of interest cause divided loyalties and can lead to biased judgment. Conflicts of interest can be real, potential or perceived.
 - (i) Real: Arises when an outside interest actually influences the HDNS associate's ability to act with objectivity, independence and integrity regarding the Committee's terms of reference.
 - (ii) Potential: Arises when an HDNS associate becomes aware of an outside interest which may influence the associate's ability to act with objectivity, independence and integrity regarding the Committee's terms of reference.
 - (iii) Perceived: Arises when it would appear to a reasonable person that an outside interest would influence the HDNS associate's ability to act with objectivity, independence and integrity regarding the Committee's terms of reference

- 3.2 *Data Access Committee (DAC)*: The Committee tasked with reviewing requests to conduct secondary data analysis for research or health service assessment purposes using the administrative databases held by HDNS for privacy, security, and confidentiality concerns.
- 3.3 *Health Service Assessment*: activity to assess, investigate or evaluate the provision of healthcare services.

4. POLICY STATEMENT

- 4.1 Conflicts of interests arise when there is a personal, professional or financial incentive or benefit to an individual (or their relatives / friends) resulting from a decision made (or influenced) in their capacity at HDNS.
- 4.2 A conflict of interest occurs when an HDNS associate:
- as the principal investigator or co- investigator, submits a request to access HDNS data for their own project; or
 - is in a supervisory relationship with a student who is submitting a request for access to HDNS data.
- 4.3 A requestor(s) or HDNS associate may also be in a conflict of interest when they have interpersonal or financial relationship/interests with member(s) of a project team or sponsor.
- 4.4 A conflict of interest can also arise from experience(s) with a project team member(s) that has an impact on the HDNS associates ability to be impartial and unbiased in their decision making.
- 4.5 A conflict of interest may be perceived if an HDNS associate is directly involved in the review and completion of their own project (or that of a family member or close friend).
- 4.6 While the preferred method of dealing with conflicts of interest is avoidance of the conflict, due to the small number of individuals in Nova Scotia with the experience required to sit as a DAC member, it may be necessary to proceed with a conflict situation. In those cases, the Co-Chairs and the committee must be confident that an unbiased review is possible. In addition, the conflict is minimized as much as possible and all impacted parties are informed of the conflict.

5. PROCEDURES

5.1 *DAC members*

- 5.1.1 If a member of the DAC is aware of or suspects that they are in an actual, potential or perceived conflict of interest, they must disclose that conflict to the Co-Chairs of the committee as soon as possible.
- 5.1.2 If the HDNS Manager, in their role as the Co-Chair of DAC, is aware of or suspects that they are in an actual, potential or perceived conflict of interest in relation to a data access request, they must immediately disclose that conflict to the Co-chair of the committee. The Co-chair will then assume the role and responsibilities of the HDNS Manager as it relates to the review of that request for data access.
- 5.1.3 In real conflict of interest situations, the affected DAC member must recuse themselves: not take part in any decision or vote and must leave the room while this is occurring. The DAC member must not attempt to influence the outcome in any way. The recusing of the member should be documented in the minutes.

5.2 HDNS

- 5.2.1 In situations where a request for data access is approved by the DAC and the requestor(s) is an HDNS analyst or is related to an HDNS analyst, the HDNS Manager will assign the project to another HDNS analyst.

6. ADMINISTRATION

6.1 Accounting

- 6.1.1 All requestor(s) and HDNS associates are responsible to disclose any real, potential or perceived conflicts of interest as soon as they become aware of them.
- 6.1.2 The HDNS Manager is responsible to ensure that this policy is followed and that the alternate arrangements are made as required.
- 6.2.3 In situations where the committee must proceed even though there is a real or could be perceived as a conflict, the DAC Co-Chairs are responsible to ensure it is documented in the minutes of meeting and in the written decision / letter to the applicant.

6.2 Monitoring, auditing and reporting

- 6.2.1 The HDNS will keep a log of conflicts and will refer to this log when planning the composition of DAC panels for review meetings.

- 6.2.2 If it is discovered that a DAC committee member has not disclosed a conflict that they were aware of, the Co-Chairs of the committee will review the situation and bring a recommendation to the rest of the committee regarding the whether the member should continue and if others should be notified.
- 6.2.3 If an HDNS staff member or contractor has not disclosed a conflict that they were aware of, the HDNS Manager (or if the Manager has not disclosed, the DAC Co-Chair) will report the matter to the appropriate employer.

7. RELATED POLICIES AND OTHER DOCUMENTS

7.1 *HDNS Policies and Procedures*

- *n/a*

7.2 *HDNS Forms*

- *n/a*

7.3 *Other Documents*

- HDNS Data Access Committee Terms of Reference