

Conflict of Interest Policy for CADTH Employees

Applicability:

This policy applies to all permanent and term employees of CADTH.

Policy Purpose:

The Conflict of Interest (COI) Policy is intended as a guideline to ensure and maintain the high ethical standards and the reputation and integrity of CADTH.

Policy statement:

- 1.0 CADTH employees shall act at all times in the best interests of CADTH. “Best Interests of CADTH” means employees will perform their work in pursuit of CADTH’s mandate in such a manner that promotes public confidence and trust in the integrity and objectivity of the organization.
- 2.0 .While all attempts will be made to achieve mutual understanding and agreement between the employee and CADTH, failure to comply with the guidelines outlined in the policy will be assessed on a case by case basis and will be subject to such appropriate measures as may be determined by CADTH, including disciplinary action up to and including dismissal for cause.
- 3.0 For the purposes of this policy, CADTH employs the definitions outlined below as guidelines in determining whether a conflict of interest exists:

3.1 Conflict of Interest:

- 3.1.1 A conflict of interest refers to situations in which personal, occupational (past, current, or future), and/or financial considerations, whenever received, may affect or appear to affect the objectivity, ability to work or fairness of CADTH employees to act solely in the Best Interests of CADTH. A conflict of interest may be real, potential or perceived in nature.
 - 3.1.1.1 A real conflict of interest arises where a CADTH employee has a conflicting private and/or personal interest, such as a close family connection or financial interest (including investments), with an organization or individual that may directly deal with or affect CADTH operations
 - 3.1.1.2 A potential conflict of interest may arise when a CADTH employee has a conflicting private and/or personal interest, such as a present or future commitment, with another organization or employer
 - 3.1.1.3 A perceived or apparent conflict of interest may exist when a reasonable well-informed person has a reasonable belief that an employee has a conflict of interest, even if it is determined there may ultimately be no real conflict.

4.0 All employees must complete a Conflict of Interest Disclosure Form. The completion of the Conflict of Interest Disclosure Form is a required condition of employment with CADTH. Thereafter, it is the employee's responsibility to immediately and openly disclose a potential, real or perceived conflict of interest as soon as it arises.

5.0 Outside Employment or Activities

Subject to the specific terms of an employment contract, CADTH employees may engage in employment and/or consulting services outside of CADTH unless the outside employment will or is likely to give rise to a conflict of interest. Any uncertainty about whether outside employment/activity will or is likely to give rise to a conflict of interest should be raised immediately with the supervisor.

It is understood that the time commitment for the outside employment/activity must not conflict with regular CADTH work hours or create excessive demands on the employee's time and effort or create a conflict of interest in the form of an obligation, interest, distraction or participation which will interfere with the independent exercise of judgment and obligation of the employee to act in the Best Interests of CADTH.

If the outside employment/activity is later deemed to be in conflict, the immediate supervisor shall inform the employee that the outside employment must be curtailed, modified or terminated and employee must advise the supervisor when the agreed-to action has been completed.

6.0 Honoraria

If a financial honorarium has been accepted and received by an employee for providing a service as a CADTH employee, the honorarium must be returned to CADTH. This applies regardless of whether the service was performed during working hours or not.

If the service was provided as a result of independent expertise of the employee (unrelated to CADTH), any honoraria received are the property of the employee. In this circumstance, if time is missed from CADTH regular work hours to provide the service, pre-approval by the employee's supervisor must be granted and the time must be requested as vacation time or used against earned in lieu time. All employees should consult with their supervisor in order to ensure that the terms are clear.

7.0 Gifts/Hospitality

CADTH employees may accept gifts or hospitality from suppliers or those doing or interested in doing business with CADTH that fall under normal business practices. However, employees should exercise sound judgement when accepting any gift or hospitality that goes beyond normal business practices and shall not accept a gift or hospitality of "material value" offered or tendered by virtue of the employee's position at CADTH. At CADTH "material value" is defined as any gift or hospitality which goes beyond the cost of a normal lunch or dinner.

See Appendix 1 to the Conflict of Interest Policy for some examples of situations which should be resolved using the conflict of interest policy and procedure.

Definitions:

See Glossary

APPENDIX 1

1.0 Examples of Possible Conflicts of Interest

To provide guidance to employees, outlined below are some examples of situations which should be resolved using the conflict of interest policy and procedure. Please note, the examples provided are only some of the possible conflict of interest situations which may arise at CADTH and are not intended to be a comprehensive list.

1.1 Outside Employment or Activities

At CADTH employees are allowed to engage in outside employment to maintain their professional pharmacist license or to provide consulting services related to an individual's specific areas of expertise. However, as outlined in the COI policy document any uncertainty about the outside employment, consulting service or other outside activities, should be raised immediately with the immediate supervisor for review.

1.2 Funding/Honoraria/Financial Support (Past, Current or Future)

In general, if a financial honorarium, funding or financial support is received by an employee from an organization and/or individual, past, current or future, the employee must consult with the immediate supervisor to ensure that there is no conflict of interest. The following are some examples of honoraria, funding or financial support which may be or appear to be in conflict:

- 1.2.1** a drug manufacturer which files a submission to have a drug listed on the drug plan formularies in a federal, provincial or territorial jurisdiction (including manufacturer's parent corporation, subsidiaries, affiliates or associated corporations) or organizations including direct competitors whose interests are affected by a drug submission filed by a drug manufacturer.
- 1.2.2** a company which manufactures products (including the manufacturer's parent corporation, subsidiaries, affiliates, or associated corporations) or organizations including direct competitors which manufacture competing products mentioned in CADTH's health technology assessments
- 1.2.3** Receipt of payment as an advisor or consultant;
- 1.2.4** Receipt of payment for academic appointments (including endowed Chairs);
- 1.2.5** Receipt of funding or honoraria for personal education;
- 1.2.6** Receipt of funding or honoraria for writing a publication or participating in the development of a publication;
- 1.2.7** Receipt of funding or honoraria for research grants;

- 1.2.8** Receipt of funding or honoraria for organizing conferences;
 - 1.2.9** Receipt of funding or honoraria for giving educational lectures;
 - 1.2.10** Receipt of funding or honoraria to be a speaker;
 - 1.2.11** Receipt of funding or honoraria for, or payment of, travel;
 - 1.2.12** Receipt of any other funding or financial support.
- 1.3** Gifts - from time to time, employees may be offered gifts or hospitality by suppliers and others doing business and/or interested in doing business with CADTH. As outlined in the disclosure requirements in 2.0 of the COI Procedure, employees must report all gifts or hospitality of “material value” to their immediate supervisor as soon as possible. When in doubt as to “material value”, employees should make enquiries with their immediate supervisor.