

CONFLICT OF INTEREST POLICY AND CONFIDENTIALITY AGREEMENT FOR RESEARCH ACTIVITIES

Purpose

ArcticNet pursues its mission in a manner that advances the goals and maintains the confidence of the research community; Inuit, First Nations, and Metis partners; funders; and other interested parties.

The purpose of this Policy is to protect the integrity, independence, and credibility of ArcticNet's research funding and review activities. It provides a framework for identifying, disclosing, and managing real, potential, and perceived conflicts of interest. It is intended to help individuals recognize situations that may be open to question and to ensure that such situations are appropriately addressed.

Scope

This Policy applies to applicable individuals as defined below.

Definitions

Applicable individual: means members and observers of research committees, external reviewers of research proposals, observers participating in research review processes, and any other individuals engaged by ArcticNet to provide advice, evaluation, or oversight of research activities, including funding decisions.

Conflict of interest: A conflict of interest exists when an applicable individual's personal, professional, or financial interests could improperly influence, or could reasonably be perceived to influence, their judgment in the performance of their responsibilities.

Conflicts of interest may be:

- **Real** – A direct conflict exists between an applicable individual's duties and their private interests.
- **Potential** – A situation could reasonably be expected to develop into a real conflict.
- **Perceived** – An outside observer might reasonably believe that an applicable individual's objectivity has been compromised.

Conflict of Interest Situations

The situations in which a potential conflict of interest may arise cannot be exhaustively set out. However, conflicts of interest generally arise in the following situations when applicable individuals:

- are a relative or close friend, or have a personal relationship with an individual who stands to benefit from an ArcticNet research activity;
- are in a position to gain or lose financially/materially from an ArcticNet research activity;

- have had long-standing scientific or personal differences with an individual who stands to benefit from an ArcticNet research activity;
- are currently affiliated with an institution, organization or company that stands to benefit from an ArcticNet research activity;
- are closely professionally affiliated with an individual who stands to benefit from an ArcticNet research activity, as a result of having in the last six years:
 - frequent and regular interactions with the individual in their duties at their department, institution, organization or company;
 - been a supervisor or a trainee of the individual;
 - collaborated, published or shared funding with the individual, or have plans to do so in the immediate future; or,
 - been employed by the institution that stands to benefit from an ArcticNet research activity; and/or
- feel for any reason unable to provide an impartial review or feedback on an ArcticNet research activity.

Procedures

All applicable individuals must sign the Applicable Individual Conflict of Interest and Confidentiality Acknowledgement Statement that is found in Appendix A prior to participating in ArcticNet research funding and review activities.

Any applicable individual who becomes aware of a real, perceived, or potential conflict of interest must disclose the conflict as soon as they become aware of it. The process for disclosure and resolution is as follows:

- **Identification:** Applicable individuals who have identified a real, perceived, or potential conflict of interest uses the Conflict-of-Interest Disclosure Form that is found in Appendix B and sends it to ArcticNet Staff.
- **Determination:** Once a disclosure is made, ArcticNet Staff raises the issue with the Chief Executive Officer (CEO), Vice-President Research (VPR) and Scientific Director (SD) of ArcticNet, who review the disclosure to determine if it constitutes a conflict of interest.
- **Resolution:** If a conflict is determined to exist, the CEO, VPR, and SD identify the nature of the conflict and communicate to the applicable individual the measures that are required to resolve the conflict. This may include full recusal from discussion and voting, restricted participation, or disclosure without recusal (for minor perceived conflicts).
- **Documentation:** All conflicts and management decisions are recorded.

Confidentiality

Applicable individuals must ensure that:

- all documentation and information that ArcticNet entrusts to them is maintained in strict confidence at all times. It must be used only for the purpose for which it was originally collected;
- documentation is stored in a secure manner to prevent unauthorized access. It must be transmitted using secure techniques and when it is no longer required, it must be destroyed in a secure manner. Any loss or theft of the documentation must be reported to ArcticNet;

- all enquiries or representations that they receive about a funding application, or its review must be sent to ArcticNet. They must not contact the applicants for additional information or disclose matters arising from the review process to the applicants;
- all discussions during a review process are confidential. Comments made by review committee members during the review of applications are never discussed with or disclosed to individuals not involved in the review process, unless required by law; and
- the identity of successful funding applicants and the details of the grants/awards remain confidential until ArcticNet decides, and an official announcement is made to the applicants and the public. The identities of unsuccessful or ineligible applicants are not made public and are not divulged, unless required by law.

Amendment and Modification

This Policy may be amended or modified by ArcticNet's CEO, VPR, and SD to ensure that it remains current and effective in protecting ArcticNet's interests.

Appendix A

Applicable Individual Conflict of Interest and Confidentiality Acknowledgement Statement

Purpose

This statement affirms my obligations under ArcticNet's Conflict of Interest Policy and ensures that all deliberations and materials related to research activities are handled with integrity and confidentiality.

Acknowledgement

Conflict of Interest

- I have reviewed ArcticNet's Conflict of Interest Policy and understand its requirements.
- I have disclosed any real, potential, or perceived conflicts of interest relevant to my work with ArcticNet.
- If a conflict arises during the course of discussions or reviews, I will immediately declare it and comply with direction provided by ArcticNet.

Confidentiality

- I will maintain the confidentiality of all materials, information, and deliberations related to ArcticNet's research processes.
- I will not disclose or use confidential information for personal, professional, or institutional advantage.

Commitment

- I will participate in ArcticNet research activities with impartiality, fairness, and integrity.
- I understand that failure to comply with these obligations may result in recusal and/or ineligibility for future participation.

Declaration

☐ I confirm that I have no conflicts of interest to declare.

☐ I confirm that I have declared any conflicts of interest in advance or will do so if they arise during this process.

Name (print): _____

Role (Committee Member / Reviewer / Observer): _____

Signature: _____

Date: _____

Appendix B

Conflict of Interest Disclosure Form

Purpose

This form is to be completed by all applicable individuals engaged in ArcticNet's research activities. It ensures that real, potential, or perceived conflicts of interest are identified, disclosed, and managed in accordance with the Conflict-of-Interest Policy.

Section 1 – Personal Information

Name: _____

Role (e.g., Committee Member, Reviewer, Observer): _____

Affiliation/Organization: _____

Date: _____

Section 2 - Disclosure

I have read the ArcticNet Research Conflict of Interest Policy and disclose the following conflict of interest situation:

Signature: _____

Date: _____