



# THE SCHOOL OF PUBLIC POLICY

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## MASTER OF PUBLIC POLICY CAPSTONE PROJECT

In the Interest of Disclosure: A Framework for Conflict of Interest in Public Policy

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## Executive Summary

This capstone provides insight into conflict of interest in public policy, and the growing challenges that exist in the space in terms of adequate and appropriate disclosure. It is becoming increasingly common for those engaged in public policy work to share their findings and opinions with the public through media activities, social media engagement, and publication with academic journals. Yet, the field currently has no clear disclosure framework for public policy academics, researchers, or experts to share their expertise with transparency and accountability. The lack of framework has led to issues with public policy experts sharing or selling their expertise, confidently working with the public, and ensuring that information shared is trustworthy and transparent. Some public policy commentators will provide a disclosure, but without a framework it has proven difficult to understand concepts like what is appropriate to include, and what is the sufficient window for past activities. This has led to a patchwork approach to conflict of interest disclosure, and growing issues within the field in terms of transparency and accountability with professionals and the public.

Through a qualitative review of three different sectors: government, private sector, and academia, this capstone outlines a series of recommendations based on identified themes and approaches found in other conflict of interest disclosure policies. At the government level, the Canadian federal government, Alberta provincial government, and Calgary and Edmonton were considered at the municipal level. Within private sector, consideration was given to sectors that normally highly overlap with the work of public policy. These include law, medicine, research and science, and journalism. Within academic,

academic publications, academic associations, and academic institutions including the University of Toronto, University of Calgary, and University of British Columbia were examined. For each sector, conflict of interest disclosure policies that were readily accessible online were identified for review. During the review process, highlighting any definitions, approaches to private interests, and an overview of disclosure methodology was included in this report.

Through this review four main themes were identified to form the foundation of a framework in public policy. This includes a definitive approach to conflict of interest, emphasizing different types of conflict, outlining the interests that can cause conflicts in professional work, and timely and accessible disclosure policies. Additional recommendations such as ensuring clear understanding of any institutional guidelines that public policy academics and researchers must adhere too is also crucial to ensuring compliance. Also, education, training and informing students and those engaged in broader public policy work about the importance of ensuring transparent engagement with the public is very important. Professional norms can go a long way in creating a public policy community that collectively understands the value of conflict of interest disclosure. With the identified themes and deeper understanding of the current state of conflict of interest across multiple jurisdictions, two definitions are provided at the end of this capstone that capture what conflict of interest is in public policy, and what a comprehensive disclosure statement should include. These definitions attempt to provide an understanding for the sector and lay the groundwork to continue to build conflict of interest disclosure practices within the sector.

## Introduction

The sphere of academic influence on public policy is expanding. It is moving beyond the traditional borders of academic publishing and into the public realm through a variety of knowledge mobilization activities, including writing op-eds, engaging in media interviews, partnering with community-based organizations, directly advising governments and political parties, and using social media as a knowledge dissemination tool. As a result, risks of real or perceived conflict of interest among publicly engaged scholars are increasing and expanding into new and different realms such that the ability to provide full and objective commentary and engagement is in question. Aspects such as grants, contracts, donor funds, consultant fees, honorariums, political donations, and memberships, paid and unpaid community positions, and private business relationships and investment holdings, to name a few, can all either influence statements made by such experts or provide the appearance of competing interests. While the presence of these interested is not necessarily the issue, it is the lack of disclosure of these interests where the problem lies. Within the traditional sphere of academic publishing, most publishers have clear standards to ensuring any real or potential conflict of interest is revealed in an upfront note in the published research, demonstrating and understanding that disclosure of information related to relevant backgrounds, interests, or other commitments must be appropriately disclosed. However, no such standard has been applied to public knowledge mobilization activities.

What exactly are competing or conflict of interests in public policy?<sup>1</sup> A conflict of interest in public policy is precisely what it sounds like: when a person's private interests create bias or influence in what they share with the public, either real or perceived. For example, a well-known academic policy expert, who has published widely in peer reviewed academic journals, writes an opinion piece on tax policy shared in a major newspaper. It is shared on social media and within relevant decision-maker circles. Upon seeing the declared credentials on the article, including their affiliation with an academic institution or perhaps membership with relevant professional associations, the public decides that this opinion is sound and trustworthy. However, what has not been declared are the shares they own in a large publicly-traded company, a company that would financially benefit from the policy advice they write about in their opinion piece, likely leading to an increase in the company's share price. This is where a clear conflict of interest arises. With the failure to adequately disclose their affiliations, there is an opportunity for the public not to be aware that the opinion given may not be unbiased and objective. Is it likely that this advice may be sound regardless of private interests? Maybe, but it is challenging to make this decision when all the relevant information about the author's competing interests is not provided.

These types of situations, undisclosed competing interests, are becoming more and more common in public policy commentary for a variety of reasons. First, while traditionally academics have avoided public commentary and profiles, academic institutions and academic funding agencies have increasingly adopted knowledge

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<sup>1</sup> Competing interests and conflict of interests are phrases that are used interchangeably. We will use the phrase conflict of interest in this paper.



mobilization policies and expectations that includes demonstrating research impact beyond the academic sphere (Cain 2018; Cooper 2018). Second, the shift towards evidence-based policy making, beyond just the realm of research methodology (Collaboration n.d.), shifted the realm of policy advice beyond just public servants by incorporating, and in some cases outsourcing it to, expert academics (Head 2015; Howlett and Craft 2013). Finally, political parties have faced increasing pressure from the public to release fully detailed and costed policy proposals and platforms and these platforms are given greater weight when they have been formed, peer reviewed, or endorsed by expert academics (Curry 2021). Despite this, and the associated concerns related to real or perceived conflict of interest as a result, there is not clear, concise, and evidence-informed framework available to academic engaging in public policy commentary related to conflict disclosure related to these activities. As a result, not only are academic public policy experts left to move forward with what they believe is the best way to approach conflicts, but so too are those seeking, consuming, or purchasing such expertise. The result is a patchwork of practices and varying levels of honesty and transparency within the field.

Without a framework available, the ongoing problem related to the uncertainty of what is necessary to disclose, when one discloses, how one makes appropriate disclosures, and how to balance the privacy considerations remains. There does exist, however, various structures from different academic entities, political spheres, and private industries alike that can be used to inform such a framework. For example, most academic journals have clear disclosure policies for authors, those working in the legal have their own set of conflict of interest norms to adhere to establishing by their governing bodies, and those in the political arena have conflict of interest and disclosure policies set in

legislative frameworks. The purpose of this paper is to establish a series of public policy guidelines that can demonstrate correct procedures and methods for those selling their expertise, purchasing the expertise, and consuming the expertise available through public policy academics, in hopes of helping to curb the growing concerns of competing interest in the field.

The analysis completed in this study indicate four important elements of an inclusive and robust conflict of interest policy. The first indicates that a clear definition is required to support and ensure adherence to a conflict of interest disclosure policy. If an individual fails to understand the concept, it is unlikely that it will be appropriately addressed. Second, identifying conflicts of interest includes those that are perceived, potential, or real conflicts. Multiple policies found emphasized that the appearance of a conflict can be just as detrimental to an individual's reputation as though it were real. Third, all types of interests can be considered a conflict of interest if they present a potential bias to the work being shared; this can include financial or non-financial, personal, or professional matters. Finally, disclosures need to be timely and accessible to the audience consuming the expertise or opinion provided. Disclosures can eliminate confusion and enhance the integrity and honesty of academics sharing their expertise and work publicly.

The paper begins with a discussion on what conflicts of interest are in public policy. This includes considering instances where they arise, and the differences in public and private interests in this field. It also notes the current situation of disclosure policies. After considering what a conflict of interest is in public policy, an analysis of existing conflict of

interest policies is conducted. This qualitative study considers various areas of work and their respective conflict of interest policies. By considering definitions, key terms, and disclosure approaches in government, private sector, and academia, several recommendations are identified that help shape a public policy framework. This final section outlines the discovered best practices through the analysis and suggests a series of recommendations for the field in how to mitigate and manage conflict of interest issues in the future. Conclusions are offered at the end to capture the themes and concepts discussed throughout.

### **Conflicts of interest in public policy**

Conflict of interest is not a unique issue to the public policy realm; it appears across nearly all professions and research spaces (Sah 2017). For researchers, scholars, and general professionals alike, it is unlikely not to have a conflict of interest arise given the complex intersections between an individual's expertise and their private and personal life (Garattini and Padula 2019; Montgomery and Weisman 2021). Experts have found that conflicts of interest often are not inevitably a conscious action of deliberate corruption but instead happen automatically and without conscious awareness (Moore and Loewenstein 2004). Therefore, it is not about eliminating these conflicts or encouraging academics to stop sharing work. Academics sharing their work can inform public policy debate, design and implementation in positive ways, improve the wellbeing of society, and eliminate the traditional barriers between academia and the public (Buys and Bursnall 2007). Instead, the focus needs to shift to bringing additional transparency and accountability to these knowledge mobilization activities and the potential conflict of interest that may arise.

When building a framework for conflict of interest disclosure in public policy, it is essential to consider the ways conflict of interest is present in the field. There are three main ways a conflict of interest could be apparent or real in public policy. The first is perceived conflicts of interest, a situation where there is not necessarily an actual or even potential conflict, but someone reasonably well-informed could potentially think there is (Government of Canada 2015). For example, a well-known public policy scholar regularly shares public policy commentary on social media on a wide variety of topics from taxation to public health to interprovincial trade. The author links and regularly promotes a conflict of interest disclosure document in their bio. However, another media source publishes alleged undisclosed information about the status of some previously received research funding from the federal government. This funding is unrelated to work that has recently received significant online attention but stirs up criticism against the individual for their lack of transparency and honesty about their publications. However, the issue here is not a competing interest but only a perceived one thanks to online conversation and speculation. Unfortunately, this perceived conflict can spell ruin for academics that share their work (Friedman 1992), even discrediting their past work and creating a long-lasting negative association.

The second instance of conflict of interest in public policy is those that are real or actual. These are often competing interests between two professional expectations, a social value and a personal value, or between an academic obligation and a private interest. For some, the concept of perceived conflict is synonymous with an actual conflict of interest and should always be regularly disclosed without the personal determination by the author of relevancy (McCoy and Emanuel 2017). Like the example previous regarding an

individual owning shares in a company and promoting policy opinions that would benefit the company, there is a clear financial motivator involved. Additionally, there can also be competing interests in non-financial matters, which can influence or bias an individual to the same degree as those motivated by financial interests (Montgomery and Weisman 2021). A non-financial conflict of interest in the public policy space can include potential name recognition for published work, a possible benefit to a family or relative for a promoted policy decision, or having personal beliefs presented as the appropriate policy response in society. More specifically, these non-financial conflicts can involve community conflicts, the way a person identifies themselves or the beliefs they hold personally. Despite these often not being generated through professional obligations, they are equally influential in decision-making, with some arguing that competing private interests are more significant than financial ones (PLOS Medicine Editors 2008).

The third instance of conflict of interest often seen in public policy is time and relevancy in disclosure. For academics and experts who regularly disclose their previous employment and activities of interest, there is no clear indication of how much time needs to pass for an engagement to no longer be relevant in disclosures. Likewise, for current arrangements, there is difficulty to ascertain what is relevant to disclose upon publication or sharing content online. Navigating these situations is tricky, and the piecemeal approach is evident thanks to the lack of clear standards within public policy. The failure to have guidelines could likely contribute to hesitation for some sharing their work online and demonstrates barriers for the public in knowing what work is transparent and honest.

These instances are precisely why a conflict of interest disclosure framework is essential for public policy. Without a framework or guidelines in place, inconsistent standards are not regularly enforced or expected. The patchwork approach to conflict of interest thus far in public policy demonstrates a glaring gap, suggesting a significant problem regarding a lack of transparency and accountability amongst those in policy practice who publish and share their work without recognizing potential conflicts, financial or otherwise (Grundy 2018). It is especially of the utmost importance to address this gap when considering the increasing commercialization and accessibility of policy academics (Caulfield and Ogbogu 2015). A clear framework, as found in other areas of work, outlines the natural course of relevancy that academics should take in sharing their work. This framework will help prevent academics from being accused of a lack of transparency and help audiences and those who engage understand the standard for disclosure. Additionally, when providing the public with critical information about best policy practices or recommendations for future policy decisions, the lack of a conflict disclosure does not allow readers to make appropriate assumptions about the presented work (Cain and Mohin 2020). By reviewing and considering approaches across government, private sector, and academia, identified themes help construct a comprehensive framework and guidelines for public policy practitioners and experts, ensuring accountability to the profession and the public.

### **An analysis of existing conflict of interest policies**

Designing and suggesting best practices for a conflict of interest disclosure framework for public policy means considering other jurisdictions and fields of work that have been

managing conflict of interest issues successfully for decades (Sah 2017). There is no need to reinvent the wheel but instead to extrapolate relevant pieces to build a system for public policy that supports the work of all engaged in the sector. Areas of consideration that bear similarities with public policy include politics and government, specific industries including law, medicine, and journalism, and within academic institutions and associations. For each specific area of focus, three main things will be considered in the analysis: definition of conflict of interest, what is considered private interests, and what types of disclosures are used to manage these conflicting interests.

The research methodology for the analysis portion of this paper is rooted in a qualitative approach. Multiple conflicts of interest policies from different fields of work are considered in terms of content and general strategy. By surveying the current procedures for conflict of interest across various sectors of work and study, conflict of interest policies were identified for consideration and analysis. These sectors include government approaches within Canada, general sectors that often overlap with public policy, academic publications from different international regions, and Canadian universities. There is a regional focus on Alberta where applicable, including in this report's legislative and academic sections. As an Albertan institution is publishing this report, it is critical to consider the frameworks in place.

Qualitative data is often more interpretative and less controlled than a quantitative analysis. The author's understandings and intentions of findings may influence conclusions, but this still presents a valuable lens for analysis. Performing qualitative research allows for a genuine sense of the content as it appears in the text, considered ease of accessibility

for the policy and creates an opportunity for natural comparison based on sentiment and overall approach. Further, when considering the definitions and language used in a policy, it is difficult to perform a substantial and valuable quantitative study that would allow for extrapolating information and findings to build a similar framework for public policy.

### Legislated and government approaches

In politics and governance, legislation and protocols are in place to ensure transparency and accountability in managing differing relationships, personal histories, and private interests. This is the case for federal, provincial, and municipal levels of government. At the federal and provincial levels, the *Conflict of Interest Act (2006)*, and the *Alberta Conflicts of Interest Act (2000)* attempt to regulate competing interests. Both pieces of legislation establish conflict of interest rules for political staff, elected and unelected, as they serve the public through their relevant government office. These rules include outlines of conflicts of interest, what counts as private interests, and the appropriate avenues for making disclosures.

The Canadian government approach to conflict of interest in the *Conflict of Interest Act* (Government of Canada, 2006) is a policy that supports the work of those elected to government and public servants that support their work. First, this *Act* clearly defines conflict of interest as “when he or she exercises an official power, duty or function that provides an opportunity to further his or her private interests or those of his or her relatives or friends or to improperly further another person’s private interests (2006).” This definition is comprehensive and illustrates the importance of financial and non-financial interests, something missing from the Alberta legislation. Further, this *Act* takes



an exclusionary approach to private interest like in the Alberta equivalent *Act*. It states that it does not include general matters that affect the public office holder as one of a general class of persons, or concerns regarding the compensation or benefits received from being a public office holder (2006). Within 60 days of being appointed to public office, the individual needs to provide a confidential report to the Commissioner outlining any potential or actual conflicts and then make relevant public declarations that vary depending on liabilities, outside activities, or gifts (2006).

In shifting to a provincial analysis, the province of Alberta was considered because of recent conversation around conflict of interest policies within the province at the government level. This includes discussion on current legislation, and a recent amendment suggested by MLAs (Ganley 2020). In taking a closer look at the province of Alberta and its legislation, the *Act* does not explicitly define a conflict of interest. The definition of private interest is negative, or instead of listing all forms of private interest, it opts instead to list what is not considered a private interest. In seeing this, it is important to consider a recent report released by the ethics commissioner of Alberta in response to concerns about the validity of the *Conflicts of Interest Act*. In this report, the Ethics Commissioner recommended that it is better to provide a positive list of private interests, or what are included as private interests, instead of delineating what they are not (Standing Committee on Resource Stewardship, 2018). In Bill 202, the *Conflicts of Interest (Protecting the Rule of Law) Amendment Act* (2020), a list of what is considered a private interest includes:

- an asset, liability or any other types of financial interest;

- a director or officer position of in a corporation, membership on a board, commission, or agency of a provincial, federal or municipality;
- an office, commission, or employment in the service of the Government of Canada; or
- a benefit or interest of a type that it could reasonably be expected that would unfairly further their personal interests.

Additionally, the *Act* notes that issues concerning a spouse, immediate family, or children are also areas of private interest concern. In turning to appropriate disclosure methods, the *Act* outlines that every government member needs to file a report with the Ethics Commissioner within 60 days of joining the Legislature, 60 days of being appointed to the Executive Council, and then annually moving forward (Province of Alberta, 2000). The disclosure needs to identify anything deemed a private interest, potential conflictual relationships, legal issues, received gifts over \$100 in value, and travel on non-commercial or private aircraft (2000). After submitting a disclosure statement, the individual shall then meet with the Commissioner to discuss declared interests, and then as necessary, publicly declare a series of interests outlined in the *Act*.

Despite these two pieces of legislation serving completely different political jurisdictions, the similarities indicate appropriate themes that can be applied to public policy. Both pieces highlight financial and non-financial conflicts of interest as relevant and something of importance to be included in a declaration. It is interesting to see a negative definition used in both *Acts*, yet it is critical to note that a recent report and subsequent proposed amendment in Alberta suggests a shift away from that approach. They also set a standard timeline for disclosure statements to be made to the Ethics Commissioner,

demonstrating the importance of maintaining transparency at the onset of any elected or appointed positions. Further, by not mentioning historical involvements, it is suggested that only current and active engagements need to be considered in conflict of interest declarations. It is also necessary to be mindful of the length and comprehension of these documents and the fact that these are written for a legal, political environment that relies on legislated approaches. In reviewing guidelines found in other industries, the scope of reference will likely be significantly smaller and more specific.

Another substantial point to note is the role played by the Office of the Ethics Commissioner in both levels of government. The Ethics Commissioner is an independent body that oversees the legislature's actions and its members as it relates to conflict of interest rules (Office of the Ethics Commissioner Lobbyist Registrar of Alberta, 2019; Office of the Conflict of Interest and Ethics Commissioner, 2021). There are Ethics Commissioners at provincial and federal levels, and its office seeks to uphold ethical behaviour and adherence to the *Conflict of Interest Act* at whichever level it serves. In declaring a conflict of interest, the Ethics Commissioner plays a pivotal role in determining what a conflict is. They ultimately stand as the final overseer for the declaration and determination of appropriate behaviour. This is a system unique to government, and this organization's independent nature helps ensure proper adherence to rules. Since there is a set of guidelines to manage expectations, in this case, the relevant *Act* makes it easier for individuals to comply and an extension for the Ethics Commissioner to do their job.

The system at a municipal level is less centralized. For both the city of Calgary and Edmonton, conflicts of interest are captured under the Code of Conduct (City of Calgary

2020; City of Edmonton 2021). The code of conduct documents applies to elected officials and those employed by the city. Selecting municipalities within the province of Alberta is appropriate as it allows a cross jurisdictional approach in the same geographic region. Both municipalities discuss the importance of navigating actual, potential, or perceived conflicts of interest in their work. In focusing on the city of Edmonton as an example, it defines conflict of interest as involving “a potential, perceived, or actual conflict between employees’ duties and their private interests.” It goes on to outline five main situations where they specifically look for conflicts of interest: offered or received gifts, using City employment for personal gain or benefit, additional employment that may conflict with City employment, personal political activity, or personal appearances before Council (City of Edmonton 2021). The Code of Conduct directs an individual to fill out a disclosure form if a conflict of interest arises, which is first submitted to a superior then to a Deputy City Manager who will determine appropriate mitigation of conflicts. Like the legislation at higher levels of government, cities manage their conflicts of interest in a comparable way, although they have a lesser level of stringency and management than the provincial and federal governments. While definitions of conflict of interest remain relatively the same, there is more focus on specific instances of competing interests, and the management of conflict of interest is not as regulated. There is no mandate for public disclosure, and matters are handled internally via city staff.

#### Government and legislative takeaways

In considering the analysis on the public sector, from the federal level to local municipalities defining conflict of interest is clearly important. The definitive approach in conflict of interest assures clarity and comprehension of the issue at hand. Also, providing

examples and even so much as suggestions for what is a private interest or a contributor to a conflict of interest provides employees and elected officials with additional guidance. Finally, the disclosure process is evidently the most important part of the conflict of interest process at a public servant level. This is likely because of the high profile these members have, but also due to the nature of their work in that they are expected to be honest and accountable to the public they serve. The disclosure process is further solidified by the extra step of having an ethics commissioner oversee provincial and federal levels of government to ensure accountability and appropriate processes are followed. For public policy, a very similar field to that of public servants, this approach will be critical to consider when framing out a framework.

## Private industry

Since public policy also influences and collaborates closely with the private sector, it is important to consider private sector mitigation approaches in creating guidelines for public policy work. Many of these industries have been navigating the complexities of competing interests for decades and have approaches that make sense and address the key concerns. Four different industries will be reviewed in this section: law, medicine, research, and journalism.

### Law

In practicing and administering the law, rules and protocols are designed to ensure transparency, honesty, and ethical behaviour by all involved. Lawyers and judges must pass rigorous tests, demonstrate a keen understanding of the law, and firmly adhere to ethics and morals in their practice. Conflict of interest within the field is taken very seriously as

lawyers are expected to best represent their client's interests, regardless of how they may feel about the issue at hand. Additionally, because of the profession's challenges, there are multiple opportunities for the appearance of conflict to emerge. For example, a client may allege real or perceived conflict depending on the outcome of their case (Kindregan 1976). Likewise, the principle of attorney-client privilege presents an opportunity for conflict of interest related to a lawyer working multiple cases (1976). These instances are why considerable thought is given to conflict of interest within the profession and in regulations across Canada.

The Canadian Bar Association (CBA) offers a wide variety of resources for practicing lawyers to manage and mitigate any conflict of interest challenges. The CBA defines conflict of interest as "the existence of a substantial risk that a lawyer's loyalty to or representation of a client would be materially and adversely affected by the lawyer's own interest or the lawyer's duties to another client, a former client, or a third person" (Canadian Bar Association 2020). Like previously seen definitions, this explanation also captures financial and non-financial obligations and considers various potential relationships that may generate conflict. The approach taken by the CBA directly influences the policies of the Federation of Law Societies of Canada; in fact, the Federation has adopted the same definition used by the CBA. However, in 2011, to generate a greater understanding of conflict of interest issues and to update their approach, the Federation completed a review. The Standing Committee on the Model Code of Professional Conduct published a Report on the Conflicts of Interest that provided additional insight into appropriate disclosures. In determining what could potentially generate a conflict of interest, the report lists:

- the immediacy of the legal interests;
- whether the legal interests are directly adverse;
- whether the issue is substantive or procedural;
- the temporal relationship between the matters;
- the significance of the issue to the immediate and long-term interests of the clients involved; and
- the clients' reasonable expectation in retaining the lawyer for the particular matter or representation (Standing Committee on the Model Code of Professional Conduct 2011).

Should a lawyer find themselves in a conflict of interest situation, the Report defines appropriate disclosure as “full and fair disclosure of all information relevant to a person’s decision... in sufficient time for the person to make a genuine and independent decision, and the taking of reasonable steps to ensure understanding of the matters disclosed (2011).” With legal matters, maintaining the client’s consent is of the utmost importance, and this is further indicated in the style of disclosure.

## Medicine

The trust given to doctors and those working in the field of medicine and health is of the utmost importance. Individuals rely on their medical practitioners and professionals to give the best advice and information as it pertains to their health. As medical advancements are made and greater collaboration happens between private business and medicine, it raises the risk of competing interests, especially as it pertains to research, product promotion, and business interests in medicine. Take for example a doctor begins working

closely with a specific pharmaceutical company that develops medication for asthma or eczema. The two work out an agreement that whenever the doctor prescribes the medication to a patient, the doctor receives financial compensation for recommending that product. This is a clear conflict of interest, as the doctor, while they may believe that the product would genuinely be the best option for the patient, may also be acting in favour of their private interests that would result in financial compensation. Likewise, a physician or pharmacist could be involved in the development of new drugs to solve a chronic condition, and when recommending specific medicines to patients, they promote the type they helped develop to ensure success of the product, and to promote their own name recognition and professional expertise within the medical community. These types of interactions, and the necessity of transparency and honesty in working with the health of the public, is precisely why conflict of interest is taken very seriously in the field of medicine.

As the major overarching physician's association in the country, the Canadian Medical Association is currently performing a review of their conflict of interest disclosure policies to work to better ensure transparency and accountability within the medical community and the pharmaceutical industries (Lexchin et al. 2020). Their previous policies have not been updated since 2007, and the association felt that with an increased collaboration between private sector and the medicinal community, it was important to provide updated policy to reflect changing needs and dynamics. The College of Physicians and Surgeons of Alberta reissued their policy in 2021, providing an outline of the standard approach within the province for mitigating conflict of interest issues. Their document identifies a conflict of interest as an instance that “may arise where a reasonable person could believe that a regulated member's duty to act in the patient's best interests may be



affected or influenced by other competing interests, including financial, non-financial, direct, or indirect transactions with patients or others. A conflict of interest can exist even if the regulated member is confident their professional judgment is not being influenced by the conflicting interest or relationship (College of Physicians and Surgeons of Alberta 2021).” The emphasis on underscoring that competing interests can happen even when an individual is confident in their professional judgement is a compelling point within this model. The document does not explicitly define private interests but does indicate that a member of the College “must resolve any real, potential or perceived conflict of interest in the best interest of the patient.” To do this, the policy states that a conflict of interest statement requires a full, frank, and timely disclosure, and a document that details what was said to the patient and the patient record.

Upon further consideration, it seems that guidelines across the health space vary in what is included in guidelines and even how substantial those guidelines are. In a recently published study, the authors recognized the need for the Canadian medical community to provide leadership and advice on developing and implementing best practices for conflict of interest (Traversy, Barnieh, and Akl 2021). The findings in the article recommend the importance of defining key terms, including financial compensation thresholds, and contemplating the definition of non-financial conflicts, establishing procedures, transparency, and an oversight committee to develop, manage, and implement conflict of interest policies (2021). In discussing how to define non-financial conflicts, the authors state that policy developers “may also consider that overly inclusive lists of non-financial interests that constitute COIs [conflict of interests] could inappropriately burden, infringe on the privacy of, or lead to discrimination against those who must fill out disclosures

(2021; Bero and Grundy 2016).” Creating or suggesting a definitive approach to non-financial interests is pertinent. However, as stated, it can be challenging to capture an appropriate list that ensures transparent disclosure without actively discouraging or dissuading the disclosure of such engagements. For a conflict of interest policy to be successful and adhered to, it must not become overburdensome for academics, experts, or researchers but instead be a justified exercise in transparency and accountability with their audience and community.

## Research

Given the nature of the research and science sector, it has long been common practice to perform conflict of interest disclosures, especially as they relate to research funding or other financial interests pertinent to the project or its developers. The presence of conflict of interest, regardless of its financial or non-financial nature, poses a challenge for professional and public trust in research results and the institutes that publish (Romain 2015). Two the main research institutions in Canada, the Canadian Institutes of Health Research, and the Social Sciences and Humanities Research Council both have their own policies to deal with conflict of interest issues.

The Canadian Institutes of Health Research has a conflict of interest policy that applies to employees of the Institute. It defines conflict of interest as, “a situation in which the employee has private interest that could improperly influence the performance of their official duties and responsibilities (Canadian Institutes of Health Research 2013).” The policy also defines real, apparent, and potential conflicts of interest, as a variance of genuineness of the conflict. This policy outlines conflict of duties, and defines it as “a

conflict that arises, not because of an employee's private interests, but between an employee's primary official responsibilities in public service employment and his or her responsibilities in a concurrent role that forms part of his or her official duties, such as an appointment to a board of directors, or other outside function (2013)." Despite not definitively outlining private interests, the policy includes things like outside employment or activities, political activities, assets, gifts, hospitality, and other benefits as things to be considered when thinking critically about potential competing interests. Since it is critical that the Institute maintains its trust and responsibility to the public, the management of conflict of interest issues are incredibly important. Upon being employed with the Institute, employees have 60 days to complete a conflict of interest report. They also have a responsibility to take all possible steps "to recognize, prevent, report, and resolve any real, apparent, or potential conflicts of interest" between official and private interest, giving favour to the public interest above all else (2013). As this is a public institution focused on research in collaboration with the government, conflict of interest is taken very seriously. There are repercussions when there is a failure to make proper disclosures including termination of employment.

The Social Science and Humanities Research Council (SSHRC) supports research training, knowledge mobilization, and helps fund postsecondary-based research in the social sciences and humanities. Their conflict of interest policy is applicable for those that receive funding or work with the research institution. They define conflict of interest as, "a conflict between a Participant's duties and responsibilities with regard to the Review Process, and a Participant's private, professional, business or public interests (Government of Canada 2016)." Like the Health Institute, they also emphasize the concept of real,

perceived, or potential conflicts. In addressing conflict of interest disclosures, the Council relies on an independent body that reviews each disclosure to determine whether the individual is eligible for funding despite the conflict of interests disclosed (2016). This independent review system ensures the integrity of the Council and their programs. As work completed with their funding often directly engages with the public, it is important that they maintain transparency and accountability in all aspects of the work, included work completed by funding recipients.

### Journalism

Journalists are responsible for sharing critical information with the public about relevant current events. There are countless professional norms within the journalism sector to ensure this happens ethically and transparently, especially concepts revolving around sources and where they get information. When reading published news coverage, an investigative journalism piece, or an opinion piece, like those submitted by public policy pundits, it is essential to be aware of the private interests at play. This includes journalists writing news pieces, but also those participating in writing opinion editorials (op-eds). While opinion editorials are based on opinion, it is still important to disclose any relevant interests that may bias the author in their view (English 2013). Although some major news organizations in the country fail to provide a conflict of interest disclosure policy, there are standards set in place, often through professional norms or associations.

The Canadian Association of Journalism has a series of principles of ethical journalism that help guide journalists' conduct and behaviour across the country. Their efforts focus on accuracy, fairness, independence, and most notably, conflict of interest. The

organization's guidelines note that in covering topics they actively participate in as citizens, they lose their credibility in covering them as reporters. While not defining conflict of interest, noting potential private interests, or outlining any specific form of disclosure, the principles outlined in their guidelines stand to assure compliance without specifically outlining rules or restrictions. It notes political activity, public relations work, and even social media engagement as areas to be cautious about when preparing an article for publication. Disclosure is essential, and every effort should be made to disclose to their audience "any biases that could be perceived to influence reporting (Canadian Association of Journalists 2011)." The New York Times, a trusted and famous source of news media worldwide, also has a series of ethical guidelines that work to ensure professional norms within the journalism community and their employees. It discusses paper neutrality, investment, and financial ties, participating in public life, and managing family ties as potential areas of ethical concern. Conflict of interest is noted multiple times throughout the guidelines as a concept, but it is not concretely defined nor specifically handled. The guidelines mention any plausible conflict of interest, real or apparent, and states that this handbook is not an exhaustive list of potential situations that may foster conflict of interest (The New York Times n.d).

The lack of a concrete definition for competing interests and its counterparts in journalism is not a new trend. In a 2001 discussion on conflict of interest in the professions, two scholars found that "these codes do not offer an analysis of the concept. It seems to be assumed that we all know what conflicts of interest are, the circumstances in which they are likely to arise, and the values that are at stake (Borden and Pritchard 2001)." Similarly, in a recent publication from 2019, the same sentiment was found that traditional focus has

been on financial conflicts of interest and has overlooked the non-financial interests that may equally cloud the judgement of a journalist (Fisher 2019). The lack of clarity on this issue has been a growing concern within the journalism community. Some news sources note the ongoing challenge in sufficiently capturing and managing conflict of interest issues. For example, a recent publication in the Montreal Gazette gained traction because of a conflict of interest concern. The news source published a piece on the value they place on transparency and the removal of a contributor that failed to adhere to transparent and accountable publishing (Chodan 2021). Likewise, Columbia Journalism Review indicated that there are still clear struggles over how to manage financial relationships of journalists (Schwab 2021). However, given earlier notice to sharing opinion editorials in these media sources, it seems likely that the challenge for managing conflict of interest is not only solely within the public policy realm but also with other areas that frequently overlap in their respective work.

#### Private sector takeaways

This section of review covered a wide variety of private industries including law, medicine, research and science, and journalism. It is evident that each industry provides a conflict of interest disclosure approach that best suits their needs and industry dynamics. Despite the obvious differences between each sector, the conflict of interest disclosures available for review provide clear themes. First, a definition of conflict of interest is once again an important piece of the policy. It clearly identifies the matter at hand and is tailored to the types of conflicts that are likely to be seen in that respective field. This was notably seen with law, in that it was framed from a legal perspective, and despite journalism not providing a definition, phrasing and professional norms lent itself to the suggestive

approach of what a conflict is. Additionally, the notions of real and perceived conflicts of interest were apparent across all jurisdictions considered. Finally, disclosure, like in the previous section, was an obvious key element of a conflict of interest framework.

Disclosure in across each analysis allowed for the audience and public to make a fair judgement on information provided and demonstrated the ethical and transparent behaviour of the professional involved. This could be seen in law, medicine, research, and journalism.

## Academia

Academia as an institution has long understand the concerns of competing interest, as nearly every private sector industry begins with formal education at a post-secondary institution. They train lawyers and doctors, inspire research, and teach journalists how to communicate effectively and ethically. The foundations within academia in competing interests are expansive, and vary depending on research publication, academic associations, and post-secondary institutions. Despite this, best practices still exist and offerings within academia can serve to provide clear insight into managing competing interests in public policy.

## Academic publications

Larger academic publishing houses like SAGE Publications, Springer Publications, Taylor and Francis, and Oxford University Press are responsible for several smaller journals and issues. The prevalence and approach of conflict of interest policies vary across different academic disciplines, with some publications failing to have a readily accessible conflict of interest policy available (Ancker and Flanagan 2007). For these publishing houses, they

have an encompassing conflict of interest policy that sets the standard for each individual publication. This comprehensive approach was one of the main reasons these were chosen, along with their general recognition amongst the academic community.

SAGE Publications defines a conflict of interest in their policy as “when authors, reviewers, or editors have interests that are not fully apparent and that may influence their judgments on what is published (SAGE Publishing n.d.).” The policy notes that these conflicting interests may arise from relationships or organizations, opportunities for personal gain, or financial opportunities (SAGE Publishing n.d.). SAGE requires a conflict of interest disclosure with the submission of an article in working to combat these challenges. The disclosure must note anything the author feels could influence their decision, and if the author feels they have no conflicts, they must also provide a statement elucidating that. What is pertinent to note is that the included disclosure will only be in journals that require it, as some of SAGE’s journals require no conflict of interest statement declaring financial or non-financial interests.

Springer Publications is another large, well-known publishing house for academic research across a variety of academic areas. Springer has a competing interests framework that outlines competing interest disclosures and other definitions to help explain the concepts. It refers to “interests that are directly or indirectly related to the work submitted for publication (Springer n.d.).” The guidelines list several areas of potential interests, including funding, employment, financial interests, and non-financial interests. Funding constitutes research grants or financial support for publication; employment means either current and anticipated employment at the prospect of publication; financial interests



include stocks and consulting fees, and non-financial interests include board positions and mentoring relations. For financial interests, Springer does remark that they do not require a financial minimum to make a disclosure but instead phrase it as, “any undeclared financial interest that could embarrass the author were it to become publicly known after the work was published,” ought to be shared under a financial disclosure (Springer n.d.). Those who submit work to Springer for publication need to provide a disclosure statement outlining any of the above interests within the past three years related to the published work. Like SAGE publications, Springer also requires that even if there are no active interests to declare, a statement is still needed indicating such.

Taylor Francis has a very similar approach to the two previous publications. Like Springer Publications, Taylor Francis defines competing interests as something that “can occur when you (or your employer or sponsor) have a financial, commercial, legal, or professional relationship with other organizations, or with the people working with them, that could influence your research (Taylor and Francis n.d.).” They require full disclosure of competing interests and outlining financial and non-financial interests as potential sources of competing concerns. Financial interests are those involving stocks or royalties, personal fees, grants or personal fees acquired through completing the work. Non-financial interests noted by Taylor and Francis are the most encompassing of the academic publications considered, and list holding board positions, receiving equipment or tools to do the research, or having personal, political, religious, ideological, academic, and intellectual competing interests as areas where conflict could arise (Taylor and Francis n.d.). Regardless of whether there are competing interests, a statement addressing the concept is

required about submission. They also provide samples of how to phrase the disclosure for ease of ensuring compliance with their policies.

Oxford University Press (OUP) has a less substantial policy than the others, but still offers a clear review for what is a conflict of interest and how it applies to academics. Their policy, like others mentioned, is for each academic journal which is published under their name. Conflict of interest is defined as “any financial interests or connections, direct or indirect, or other situations that might raise the question of bias in the work reported or the conclusions, implications or opinions stated” (Oxford University Press n.d.). For publication with their journals, OUP requires that each author of the paper be included in conflict of interest disclosure statements. No further definition on what a conflict of interest could be is listed, instead what they call a “conflict of interest test,” is considered. The test asks, “is there any arrangement that would compromise the perception of your impartiality or that of your co-authors if it was to emerge after publication and you had not declared it?” (Oxford University Press n.d.). This approach allows authors to use their own discretion in what they deem would be a conflict. Disclosures need to be made upon submission to the journal, and failure to comply can result in the work not being published.

#### Academic associations

Academic associations, like publishing houses, also develop policies for members to adhere to when publishing and sharing research and articles. Having associations set these standards helps establish and enforce professional norms within the specific industry. For example, the American Economic Association fosters collaboration with academia, business, government, and consulting groups, all with diverse backgrounds and

experiences (American Economic Association n.d.). They focus on discussing, disseminating, and publishing economics research across various subsections of the field. They have a disclosure policy that applies to authors and researchers publishing with the Association. Submissions to American Economic Association journals need to state sources of financial support for the specific research involved and anything of relevance dating three years back, any non-financial interests involved, either financial or non-financial interests of a close relative or partner and if any other party were to review the paper before its publication (American Economic Association n.d.). Not only is this mandated for publication with the Association, but they also go so far as to encourage the application of this same standard to all other scholarly journals, op-ed pieces, other media coverage and any testimony provided to the government. In submitting to the Association, a separate document titled “Disclosure Statement” must be uploaded, with either the indicated interests or a statement declaring that there are no competing interests involved. Failure to disclose will result in rejection of the submission, reversing the acceptance, or publishing a retraction if it has already been released, and all issues are shared with the Executive Committee of the Association for further appropriate action. The robust nature of this Association and its conflict of interest approach demonstrates a keen attention to transparency and honesty within the field and helps set the expectation that experts associated with the organization adhere to the same ethics and principles.

#### Academic institutions

The final subset of academia is post-secondary institutions that promote the work of their faculty and staff through publishing, engaging, and working with the private sector. As most universities are private, independent organizations, conflict of interest policies

reflects this approach. In a study of post-secondary institutions in Canada, researchers found that policies tended to focus on financial conflicts of interest and that there is a generally poor understanding of conflict of interest across academic institutions in the country (Williams-Jones and MacDonald 2008).

In Canada, there is the Group of Canadian Research Universities (U15). These academic institutions adhere to stringent research and academic and work to further the academic capabilities of Canada across 15 different universities (Group of Canadian Research Universities n.d.). In considering conflict of interest analysis, three universities were identified as appropriate choices due to their affiliation with the U15 Group. The University of Toronto's conflict of interest policy is from 1994, and applies to academic staff, outlining three different scenarios when a conflict of interest may emerge:

- paid professional activities that undermine the faculty's ability to complete their professional university responsibilities;
- non-professional activities that the faculty member participate in for personal gain that undermine their professional university responsibilities; or
- personal or financial interests that conflict with a faculty member's responsibilities to the university (University of Toronto, 1994).

It states that no faculty members may participate in engagements that create a conflict of interest, but in receiving activity approval from the appropriate authority, "the activity shall be deemed not to be a conflict of interest (1994)." Additional areas where a conflict could emerge are receiving gifts, paid professional activity, research contracts, personal relations with colleagues and students. When a conflict emerges, disclosure is required to

the appropriate authority, who will decide whether the conflict of interest will be approved or denied as appropriate. It remarks that disclosures do not require any details of the personal relationships that created the conflict as individuals are entitled to confidentiality (University of Toronto n.d.). Upon disclosure, appropriate steps are taken to separate the interests, ensure the necessary protection of interests, and ensure no unjust allegations against reputations are made.

The University of Calgary is another highly regarded institution in Canada and member of the U15, with a wide variety of specialties and experts working at the school. Additionally, located in Calgary, Alberta, this institution lends itself to the same regional considerations as previously mentioned provincial and municipal policies. Their conflict of interest policy was last updated in 2019, and it applies to all staff members, employees, appointees, and student employees. The school defines conflict of interest as “when, in the course of carrying out their university responsibilities, an individual takes any action where they know or ought to know that the action may result in an actual or perceived private benefit to them or to a related person or Related Entity (University of Calgary 2019).” The university further writes that they recognize that conflict of interests will occur but strive to ensure that it is disclosed and managed transparently. As defined by the university, private benefits include interests involving financial benefits, personal benefit, or furthering a private interest, and excludes those of general application, affect a person as a broad member of a class, or are inconsequential (2019). Related entity refers to interests such as a public corporation in which an individual may own shares, board membership of a non-profit, or having a partnership or relation (i.e., parent or sibling) with an individual involved in a related entity. For academic staff members, there is an ongoing obligation to

disclose any interests to their dean in writing as they arise. The dean will then decide if this conflict can be managed or inappropriate and needs to be managed via a third party or terminated. For other employees and appointees, they are required to submit a disclosure form by January 31 of every year outlining any conflicts. Their manager will then conduct the same process as noted above and determine the next steps (2019).

The University of British Columbia (UBC) takes a slightly different approach than the University of Toronto and the University of Calgary, although still an integral member of the U15. Due to a recent review, UBC has a substantial conflict of interest policy approach, which may be considered the best practice for the sector. UBC operates under two streams of conflict of interest: the traditional conflict of interest and a conflict of commitment. Conflicts of interest, as per their definition, “occur when an aspect of our private life influences or conflicts with the decisions we make on behalf of UBC or appears to do so.” Conflicts of commitment are slightly different and “occur when university resources are used for non-university activities, or when a person is engaged in non-UBC activities (University of British Columbia 2020).” Conflict of commitment can include information resources like data, physical resources like office space, or human resources like working hours or time of other employees. All faculty and staff need to disclose at least annually any conflicts of interest and again whenever a new one arises (2020). The disclosure is shared with their dean or their delegate for approval. What is unique about the UBC approach is that they have a committee of university personnel responsible for assessing disclosures, an annual audit of declarations and help in any final appeal processes for decisions related to conflict of interest (University of British Columbia 2019). This committee provides an additional layer of accountability and transparency for conflicts of interest at the university

and helps ensure that everyone is acting in their best interest to ensure integrity on behalf of the institution. This committee is also responsible for educating UBC individuals on the university's policy and reviewing any additional concerns related to conflict of interest.

#### Academic takeaways

Although divided across various public and private institutions, the academic community shares similar approaches in dealing with conflict of interest disclosure. Academic publications, associations, and institutions all work to have a conflict of interest policy to help guide academics, researchers, and students as they share their expertise and work with the public. As seen previously, definitions play an important role in ensuring understanding and adherence to policy. Each academic publication, association, and institution considered in the analysis explained what conflict of interest is. Likewise, each took the approach of real and perceived conflicts carrying importance when thinking about conflicts. Relevancy and timeliness are two additional factors frequently included. These concepts include the approach taken by academic publications in ensuring submission disclosures include anything from the past three years like in SAGE publications and the American Economic Association, or annually like seen with educational institutions including the University of Calgary and UBC. Finally, in academia, like others, disclosure is the essential piece for conflict of interest policies. However, there is a clear emphasis on including disclosure statements even in instances where there are no potential conflicts to disclose, specifically with journal publications. This requirement provides an additional layer of protection for the publication and for the academic involved in demonstrating that disclosure statements are necessary, regardless of conflicts or not.

## Overall analysis takeaways

When thinking about shared approaches over the three distinct areas of work – government, private sector and academia – there are clear themes that emerge, along with unique systems that are not necessarily relevant or applicable to the field of public policy. The main clear themes include a definitive approach to conflict of interest, capturing multiple types of conflicts like perceived and real, various interests that could spur conflict, and a transparent disclosure system. However, different across different sectors, each demonstrates apparent similarities in approach to conflict of interest. Each policy indicated these methods in communicating and ensuring conflict of interest disclosure with their employees, affiliates, or researchers. These themes will help shape and inform the recommended policy framework for public policy.

While clear themes emerged across the sectors, there are also unique approaches that would not apply to the field of public policy worth noting. These approaches have value for their specific area of work, but implementing them in the diverse and broad arena of public policy expertise and knowledge sharing would prove difficult. The first is the concept of having an independent oversight body responsible for reviewing and overseeing decision-making on conflict of interest disclosures. Due to the nature of public policy work, it is challenging, if not impossible, to enlist a single body that public policy experts are accountable to. Within academic institutions, this may be a possibility. Still, when thinking about public policy as an area of study and work, it is not feasible to make this similar body like an ethics commissioner or review board as seen with UBC.



Similarly, some disclosure policies have a potential penalty or institutional or professional consequences for failing to disclose. For example, within the research community, this could be termination of employment for lack of disclosure. With associations like the American Economic Association, there are potential long-term professional consequences involved. But, again, this type of approach is not feasible for public policy as it requires a third party to review the disclosure to determine its validity. Instead, this highlights the need for peer oversight and increased accountability amongst all the institutions that public policy experts engage with.

### **Recommendations for a public policy framework<sup>2</sup>**

The similarity between all these independent, different industries is the fact that they all understand the importance of maintaining integrity, transparency, and accountability with the public when it comes to addressing competing interests. Public policy is meant to serve the public in the same way, yet the failure to address conflicts of interest within the profession is made acutely aware by the robust systems other jurisdictions have in place. These different approaches can help shape what is desperately needed by the public policy community: a framework for public policy conflict of interest disclosure. Four main elements were made apparent through the cross-jurisdictional qualitative analysis:

- Defining conflict of interest;
- Emphasizing the difference within perceived, potential, or real conflicts;
- Identifying and including a variety of interests in any disclosures; and

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<sup>2</sup> See Appendix A for table version of findings across jurisdictions.

- Timely, relevant and comprehensive disclosure practices.

These themes help shape the approach that should be taken by public policy experts, researchers, commentators, and those engaging in knowledge mobilization regardless of the stage they choose to do so.

## 1. Defining conflict of interest

Each substantial policy that addressed conflict of interest included a comprehensive definition of what a conflict of interest is. From legislation that included more robust definitions, to the quick comprehensive statement found in private industry definitions. Including this type of definition in a framework makes it clear to those engaging with the policy what they ought to be looking for as it regards to their own work, and what to expect of other people in making their disclosure statements. This thought was echoed throughout articles as well, especially in thinking about conflict of interest disclosure within academic institutions for faculty and staff (Williams-Jones and MacDonald 2008). A definition eliminates confusion and uncertainty and demonstrates the fact that this is a tangible issue that warrants a definition to describe (Friedman 1992). As seen in other jurisdictions, the definition adapts to what is needed to be address specific to that area of work. A definition for public policy competing interest needs to be robust and comprehensive as public policy has many intersections that allow for potential and real conflicts of interest to emerge. Considering additional identified themes allows the creation of a substantial and comprehensive definition, as found later in the paper.

## 2. Emphasizing the difference within perceived, potential, or real conflicts

Underscored at the onset of this paper through exemplification of situations where conflict of interest arises in public policy, the idea of perceived, potential and real conflicts are demonstrated. These same sentiments were then echoed throughout several of the policies and academic articles reviewed across multiple jurisdictions including the Government of Canada and within municipal governments (City of Edmonton 2021; Government of Canada 2016; Kindregan 1976). From legislation and law to science and medicine, and within the academic community, the appearance of a conflict of interest can be just as influential in public policy as though it were real. While it may not bias the judgement of the author, a revealed potential conflict of interest by the public can prove detrimental to the credibility and value of the shared work. Likewise, a potential conflict of interest could quickly transition into a real conflict of interest and cause additional problems upon failure of disclosure. This has been an area of contention within academics, and the uncertainty has created strife within academic groups. But the evidence through this analysis is clear. Declaring competing interests that are deemed real by the author, while potentially ignoring other interests is a recipe for disaster. Should it be discovered that an author omitted interests, rather than include them at the onset of their work, it could spell disaster for their creditability and research; asking for forgiveness rather than permission is not an appropriate standard within public policy competing interest disclosure. All types of competing interests, real, actual or perceived, are important and need to be included in disclosure statements (Annane et al. 2019).

### 3. Identifying and including a variety of interests in any disclosures

Throughout various policies, there were several different types of interests that were identified as potential areas of concern including personal, private, financial, and non-financial. These types of interests were identified in nearly every single policy considered. Simply including financial interests is no longer sufficient in ensuring transparency, instead it goes beyond and recognizes the influence that non-financial bias can have on an academic. Under financial and non-financial interests rest those that are more personal, private interests than those that emerge during professional opportunities. Personal interests refer to ideologies or beliefs that an individual may have where it is only a feeling of personal gain or triumph that could cloud their judgement to unjustly promote an idea or concept. Private interests are those that result from professional relationships, personal activities and participatory roles, or other similar types of commitments. This same notion was identified in the Taylor and Francis Publication approach (n.d.). Defining these interests is a complex endeavor, one in which it is likely to never be truly successful in capturing the robustness and variety, not to mention the continuous changing and advancements that grow a new set of competing interests. It is not the definitive list that is important, but the sentiment and understanding of these terms as it relates to competing interests. Creating a comprehensive list of every single personal or private interest that may bias an individual's judgement would likely only deter an individual from submitting a conflict of interest disclosure due to the cumbersome nature of potentially have to disclose an extensive list of activities (Traversy, Barnieh, and Akl 2016). These concepts are clear and should not be new to anyone publishing expert public policy opinion or commentary. Instead, it is about setting the standard that the rule is no longer financial interests only, for

researchers and academics, the opportunity for bias extends beyond a blank cheque (Cappola and FitzGerald 2015).

#### 4. Timely, relevant, and comprehensive disclosure practices.

Timely, relevant, and comprehensive disclosure was the result of all conflict of interest policies considered in this paper. While some provided more concrete timelines of what to include, and others included phrasing and approaches to be taken, they each fundamentally emphasized the value and importance of disclosing interests. Having a conflict of interest is not a bad thing, nor is it rare or unavoidable, it does not indicate dishonesty or a failure in transparency, but instead is something that needs to be appropriately dealt with to eliminate any further issues. An important consideration that was demonstrated in multiple policies was the value in making a disclosure even when there wasn't anything to disclose, by including a statement noting that exact fact. This was seen in academia (SAGE Publications n.d; Springer n.d; Taylor and Francis n.d; University of British Columbia n.d.), and within some other private sectors when looking at publishing or sharing work (Government of Canada 2016). This too is an element that should be included in a public policy framework, to set the standard that disclosure statements always be included regardless of their content. This helps those working in the field, and those consuming the information that they share. Additionally, the relevancy of the interests arose in multiple policies. In particular, the academic policies focused on a timeframe of three years as a benchmark for what to include. Having set timelines for what to include helped eliminate confusion, established a standard, and assisted combating issues of perceived and potential conflicts. Moreover, a specific characteristic to the American Economic Association policy

was the importance of disclosing not only when it is explicitly required but making it a common practice when participating in any type of engagement where the expertise of the individual prompts a level of trust or accountability with the audience; this included things like media appearances, opinion editorials, and in research. The heightened level of disclosure is not only warranted for the field of public policy but needed given to the flexibility and variability of the work public policy pundits, commentators and researchers do. Putting the audience first when conducting a conflict of interest disclosure is important (Sah 2019), and even more so given the work of those in public policy. With work not exclusively featured in established journals but with the general public, it is important to maintain transparency and accountability across all divisions of engagement, not only when there is an obvious expectation. Finally, some disclosure policies had a clear disciplinary element that further discouraged failing to make proper disclosures. For those in legislation and other professional settings, that could mean termination of employment. For journals and academic settings, it could result in a retraction or publication and perhaps a lack of opportunity to further publish, depending on the ruling of a secondary committee. These types of actions are difficult to enforce in a larger academic space, like public policy. There is no clear oversight committee or association in which the majority subscribe to ensure compliance with policy. Instead, like the serious ethical and moral standards set in law and medicine, the behaviour of the professionals is held to such a standard that the expectation is disclosure and transparency, and a failure to do so can result in professional consequences and embarrassment.. Overall, the concept of conflict of interest disclosure is not new or unexpected, several publications also recommend disclosure as a solution to help combat conflict of interest issues (Friedman 1992;

Loewenstein et al. 2011; Sah 2014). Ultimately, having normalized and expected disclosures by all public policy contributors will enhance the benefits of disclosure for everyone (Cain et al. 2011).

### Defining conflict of interest

With all of that in mind, the identified themes and qualitative considerations gave way to the following definition for public policy conflict of interest:

*Conflict of interest in public policy occurs when an individual's personal or private interests, both financial and non-financial, generate an inability or a perceived inability to appropriately separate their bias from their expertise in communicating public policy issues.*

This definition highlights the two significant categories where conflict of interest can be generated, both personal and private interests. Personal interests refer to ideologies or beliefs that an individual may have where it is just a feeling of personal gain or triumph could cloud their judgement to unjustly promote an idea or concept. This same notion was identified in the Taylor and Francis Publication approach. Then it also notes two additional key elements that could be seen as relatively new to the arena of conflict of interest, the challenge between financial and non-financial interests. Some have argued that non-financial interests are not genuine conflict of interest, such as those previously mentioned (Bero and Grundy 2016). Yet nearly all policies considered included this important distinction. The obvious acceptance of this across jurisdictions is precisely why it is also included in the definition above. A large portion of work within public policy does not necessarily directly relate to funding or financial matters, and that too needs to be appropriately captured. Finally, this definition mentions perceived and real conflict of

interests. This is another important distinction that is echoed throughout several areas of work. These policies agree that failure to disclose can result in permanent damage to reputation, generate substantial lack of trust, and create challenges in doing work effectively. This definition will likely grow and evolve as any governing practice should, but at its basis it stands to capture the critical elements of competing interests, and leave no room for misinterpretation, misrepresentation, or the failure to disclose.

### Defining disclosure practices

Likewise, this review produced the following approach to disclosure practices within the field of public policy:

*Disclosure of an individual's potential, perceived, or real conflict of interests should be included upon submission to academic journals, participation with the media or public, publication in print or news media, or speaking before a legislation or decision-making body. This involves any interests within the last 3 years that warrant disclosure (see conflict of interest definition). Disclosure must be accessible to the public consuming your work. If no conflicts exist, a statement recording that fact must be included.*

The above definition considers evidence from across a wide spectrum of industry and work. No set style was established for disclosure in reviewing policies, so in lieu of making a set form or phrasing to address conflicts, the definition simply states what should be included, within what timeframe, and in what instances or spaces. This allows for flexibility, inclusion, and ultimately discretion of the public policy commentator within a specific set of means. The timeframe of three years was selected to keep in line with existing standards in academia set by more than one publishing institution, and as found



within academic associations. Additionally, the concept of accessibility was noted in the journalism policy review and within publication in academic journals in that it is important that the audience be aware of any affiliations. Accessibility will likely look different to everyone, but the availability of the disclosure statement to the public is what is important. This may mean at the beginning of an article, the beginning of an interview, or readily available via website or social media.

## **Final recommendations**

Beyond individual public policy commentators, researchers, academics, and pundits adhering to the above definitions of conflict of interest and the subsequent disclosure policy, there are additional steps that can be taken to change the standard of conflict of interest within the public policy field. Currently, there exists no clear framework, no clear academic or institutional approach for the field, and the areas in which public policy folks engage, like print and digital media, fail to set a clear standard for those engaged.

First, academic institutions should outline a policy of disclosure for all those that work, publish, or declare their associations with the academic institution when engaging with the public. Disclosure of the affiliation with the school but not addressing anything else is not appropriate nor is it sufficient in conflict of interest disclosures. Conflict of interest policies should promote individual responsibility, professionalism, academic integrity, and encourage a culture of disclosure and discussion for matters of conflicting interest (Annane et al. 2019). Having academic institutions with strong, comprehensive guidelines helps establish norms and expectations within the field. Likewise, holding colleagues and fellow researchers and commentators accountable for their disclosure

statements or lack thereof can change the conversation on the validity and importance of conflict of interest disclosure. It can be difficult for the public to know what an academic or researcher is involved with, but a colleague or someone affiliated may be aware of their conflicting work. Simply questioning your colleague on why they did not disclose a specific interest or reminding them of the value and importance of transparency and accountability can trigger an opportunity to generate new norms and conventions within public policy. It was found in a recent study that individuals look to their immediate peers for inspiration, because they view them as an important reference group and use them as a benchmark for their own ambitions and behaviours (Tartari, Perkmann, and Salter 2014). Education of these policies is critical to all employees and students (Sanders et al. 2020). Engaging the next generation of public policy commentators and researchers in this expectation is vital to the success and setting of professional norms for the future. Second, the broader public policy community needs to be aware of the expectations for conflict of interest disclosure and independent institutions like news media, blogs, and other publishing avenues need to set a higher expectation for competing interest disclosure. The barriers between the public and academic institutions are shifting, and as more academics engage with the broader public, the understanding of transparency and accountability needs to be established by both parties.

## Conclusion

The evidence is clear. Competing interests are real, influential, and need to be appropriately disclosed when sharing any work or opinion with the public. This is true for government, lawyers, doctors, researchers, and academics across countless disciplines, and

it is time for public policy to meet that standard. The demand for change is seen through news coverage and social media, the public wants to be in the know on what is motivating public policy experts and researchers when they publish their findings. Knowledge mobilization is only truly helpful to the public when they can accurately and fairly understand the motivators behind an opinion or perspective from experts. Each different group of professionals has their own approach to competing interests that works for their needs. Government legislated protocols, lawyers, doctors and researchers set the expectation in their professional frameworks, and journalists are taught the importance of integrity and ethical reporting from the start. Public policy needs to make the shift in the same direction, and the evidence from the qualitative reviews is clear.

Through this review, four key themes were identified that form the basis for conflict of interest disclosure policies. Crafting and understanding a clear definition, recognizing the that competing interests are more than just is what is real, but also perceived and potential, money is not the only motivator for bias, and disclosure, while not the ultimate solution, can certainly help the lack of transparency and accountability that current exists in the field. It is also important to set new professional norms, educate public policy experts and their students on the expectation of disclosure, and work with academic institutions and media publications to raise the standard for public policy commentators and pundits when they share their opinion. It is no longer acceptable for public policy experts to taut opinions and ideas over the internet or on television without giving proper recognition to their motivators, financial or otherwise. There is an opportunity to elevate the field, to help shape public policy and the direction future legislation and regulation. But

it must be done ethically, with the true motivation of helping the collective public, not just underlying private interests.

## Appendix A: General overview of findings

| Theme  | Government and Legislation   | Private Sector: Law  | Private Sector: Medicine   | Private Sector: Research and Science  | Private Sector: Journalism   | Academia: Publications  | Academia: Associations   | Academia: Institutions  |
|--|--|--|--|---|--|---|--|---|
| <b>Definition</b>                              | Definitions included at all levels of government   | Definitions included with a legal focus  | Definitions included with a medical focus; updated definitions are under development                       | Definitions are included as they relate to research and science work  | Limited definitions available; appears to be more ad hoc                                   | Definitions included and varied per publication   | Definition included as related to the association                                  | Definitions provided related to academic settings                                       |
| <b>Real, perceived, or potential conflicts</b> | Focus on real conflicts; limited conversation on perceived/potential   | All types of conflicts are included; but disclosure is dependent on instance                             | All are included in reviewed documents   | Focus more on real or perceived conflicts over potential  | Limited definitions available; encouraged to adhere to ethical reporting standards         | All potential conflicts are encouraged to be disclosed at time of submission              | All potential conflicts are included   | Varies per academic institution; UBC had most advanced model of those considered        |
| <b>Variety of interests</b>                    | Focus on financial and non-financial, including personal and public interests  | Any type of interest which may interfere with client or professional work needs to be disclosed          | Financial and non-financial are mentioned  | Focus given to putting the public above all else; includes a heavy emphasis on financial but other types are included | Limited definitions available; some policies captured lists of potential issues            | Financial and non-financial interests included; some include beliefs and personal matters | All interests are included (financial, non-financial, private, beliefs)            | All interests are specified   |
| <b>Disclosure</b>                              | Disclosure within 90 days of office, with forms submitted to superior and independent ethics commissioner for review | Disclosure made promptly at time of conflict to client or employer with a focus on complete transparency | Disclosure needs to be timely and accessible, and include details of the conflict and the patient involved | Disclosure is necessary upon submitting for funding or employment; failure to disclose could                          | Disclosure is limited, and instead removal of the conflict is encouraged wherever possible | Disclosure upon submission for publication in required; Springer specifically             | Full and complete disclosure is always encouraged regardless of context, including | Disclosure made annually or at the time of conflict to superior; UBC has an overarching |

|  |  |  |  |                        |  |                              |                                     |                     |
|--|--|--|--|------------------------|--|------------------------------|-------------------------------------|---------------------|
|  |  |  |  | result in<br>penalties |  | requires a 3<br>year history | previous three<br>years of activity | independent<br>body |
|--|--|--|--|------------------------|--|------------------------------|-------------------------------------|---------------------|

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