



DHDP CONFLICT OF INTEREST POLICY

(08 June 2026)

This policy applies to:

- institutions and individuals involved in DHDP activities, including TFRI's board and leadership when overseeing DHDP activities,
- TFRI staff working on DHDP,
- institutions participating in DHDP Network Activities to develop the DHDP Platform, including technology partners and consultants, and institutions and individuals participating in Eligible Projects who receive financial support through DHDP,
- individuals participating in DHDP governance, advisory or review committees.

More specific policies or agreements may apply to groups such as the Executive Committee. Where the terms of this policy conflict with a legal agreement with TFRI, the terms of that legal agreement take precedence.

Conflict of interest (definition):

"A conflict of interest may arise when activities or situations place an individual or institution in a real, potential or perceived conflict between the duties or responsibilities related to research, and personal, institutional or other interests. These interests include, but are not limited to, business, commercial or financial interests pertaining to the institution and/or the individual, their family members, friends, or their former, current or prospective professional associates."

(Tri-Council Policy Statement, 2022, Chapter 7).

In the context of DHDP, a conflict of interest would arise where a personal or institutional interest conflicts with the duties of the individual or institution related to the DHDP. Conflicts of interest related to the DHDP may jeopardize the protection of health data shared on the DHDP Platform, the ability of the DHDP Platform to effectively facilitate health research and innovation that ultimately benefits patients, or the prudent and reasonable use of resources. In turn such conflicts risk undermining public and stakeholder trust in the DHDP.

Individuals and institutions involved in DHDP must avoid and prevent conflicts of interest, or where this is not possible, ensure any situation that could reasonably be interpreted as a conflict of interest is promptly disclosed to TFRI and appropriately



managed. While in some cases it will be better to manage the conflict of interest, in other cases, appropriate management will require abandoning one of the interests in conflict.

Institutions and individuals subject to this policy must follow the conflict of interest terms in the **Network Membership Agreement section 7(c)**.

They must “promptly disclose to TFRI any real, potential or perceived conflicts of interest resulting from the Member’s:

- (i) participation in the DHDP and any DHDP committees, projects or activities;
- (ii) interest in any other Canadian or international initiatives that may adversely impact the development or use of the DHDP; or
- (iii) financial, business or other interest in an organization, including any for-profit company (such as, for example, a spin-off company) that is applying for or carrying out any work related to (1) the development or operations of the DHDP, or (2) an “Eligible Project” funded in any manner under the SRF Agreement,

and abstain from participating in all DHDP decisions relating to that conflict of interest”.

For clarity, participation in other Canadian or international initiatives involving cross-sector and cross-institutional health data sharing as part of collaborative research and technology development would not constitute a conflict of interest *per se*. A clear example of a conflict of interest, however, would be the use of confidential information obtained through participation in DHDP for the benefit of a similar or competing initiative.

Institutions bound by this policy are responsible for ensuring that the individuals under their responsibility are informed of and respect this policy when carrying out activities related to the DHDP. In particular, institutions bound by this policy shall ensure that no current or former public servant or public office holder to whom the *Values and Ethics Code for the Public Service*, the *Values and Ethics Code for the Public Sector*, the *Policy on Conflict of Interest and Post-Employment* or the *Conflict of Interest Act* apply, will derive a direct benefit from participation in DHDP activities unless the provision or receipt of such benefits is in compliance with such legislation and codes.

The DHDP initiative supports Eligible Projects that involve cross-sector collaborations for health AI research and technology development through use of



the DHDP for privacy-preserving data discovery and federated analysis/learning approaches. Institutions and individuals involved in Eligible Projects must be alert to, avoid, and prevent conflicts of interests related to their Eligible Project activities, or where they cannot be avoided disclose and appropriately manage these conflicts. Institutions are expected to have their own conflict of interest policies in place, which may apply to such conflicts. For example, there may be a situation where an individual based at a healthcare institution has financial or other interests in a private company that is a partner in the Eligible Project who intends to access and analyze health data or to provide services. Any such conflicts of interest should be disclosed and managed appropriately according to the policies of the participating institutions.

Administration. TFRI shall be responsible for the administration of this policy. TFRI, acting reasonably, or the Minister of Industry, shall have sole discretion in determining if there is a conflict of interest, and determining if the efforts taken to manage a conflict of interest are appropriate. If a person has reasonable cause to believe that an institution or individual bound by this policy has failed to disclose a real or perceived conflict of interest, they shall report this to TFRI. After having heard from the institution or individual in question and further investigation, TFRI shall determine if there has been a failure to disclose and shall take appropriate action, which may include removal from a committee, or where provided for under legal agreement may result in termination of participation in an activity such as a Network Activity, an Eligible Project, or Network Membership.