

Confidentiality

The 2009 Case COI policy states in section III:

“All information contained in reports or obtained in the course of reviewing a potential conflict of interest, institutional conflict of interest, or conflict of commitment, is strictly confidential. The information is only available to the Conflict of Interest Office and the individuals charged with the responsibility for review in the particular case.”

Due to the highly sensitive nature of the information to which the Outside Interests Committee has access, it is vitally important that each member of the Committee maintain the highest level of confidentiality, except as required by law or institutional policy.

Prior to attending the first meeting, each member will be required to sign the Outside Interests Committee Confidentiality Agreement. The Confidentiality Agreement will be collected by the Office of Outside Interests.

Each guest will be required to sign the Outside Interests Committee Confidentiality Agreement prior to the start of the meeting he or she attends, and the signed Agreement will be collected by the Office of Outside Interests.

The Confidentiality Agreement does not expire.

Signatories will be provided with a copy of the form. Signed Confidentiality Agreements will be kept on file by the Office of Outside Interests.

Refusal to sign the Confidentiality Agreement by either a guest or a member will preclude the participation of that individual.

The opinions expressed by members of the Outside Interests Committee, either at a convened meeting or in other Committee proceedings (such as e-mail voting), are confidential to the extent permitted by law and institutional policy.

There may be times when it is appropriate to externally divulge procedures and/or best practices of the Committee. For example, such information may be provided to aid members of the University in understanding the Outside Interests Committee's conflict of interest review process. However, in order to best safeguard members' confidentiality, even when appropriately discussed externally the procedures and best practices of the Committee may not be attributed to individual members.

Strict adherence to confidentiality policy and procedure is particularly crucial when an OIC member either has an individual conflict of interest or reports to someone who has an individual conflict of interest under discussion in the Outside Interests Committee.

Confidentiality Agreement

As a member of the Outside Interests Committee of Case Western Reserve University (OIC), I am aware that I will have access to (1) documents and discussions that may be confidential, including financial information concerning faculty members, staff, researchers and research personnel, or concerning Case or its affiliated institutions (2) documents and information that may represent the ongoing, unpublished research efforts of researchers and/or their research sponsors, and (3) information, documents or discussions concerning potential or actual conflict of interest issues involving faculty members, researchers or research personnel that the OIC may be reviewing (all hereafter referred to as "Confidential Information"). I understand that disclosure or premature disclosure of such Confidential Information, including any and all discussions during OIC meetings, may lead to irreparable harm to faculty members, researchers, their sponsors, or to Case and/or its affiliated institutions. To the extent permitted by law, I will maintain strict confidentiality of any Confidential Information and will not disclose under any circumstances such information to any third party, including any family member or friend, unless necessary to fulfill my duties as a member of the OIC. I understand that I may disclose information related to my work on the OIC to: (1) my supervisor(s), (2) appropriate senior management of Case and/or its affiliated institutions when necessary in order to carry out the directives of this Committee, or (3) to the regulatory body charged with conflict of interest review and management at a Case-affiliated institution. I also understand that I may request from the institution involved in the research study that I be permitted to share general information regarding the conflict of interest issue or the research study in order to fulfill any teaching, research or other work duties at Case or an affiliated institution, as long as the information does not include any name, identifiable information, or descriptive that could cause any other person to become aware of the identity of any particular research project, researcher, sponsor, conflict of interest decision, or OIC member. Nothing in this Agreement prohibits me from providing Confidential Information to any institutional officials to report a concern or compliance issue.

Signature

Date

Printed Name