

RESEARCH SAFEGUARDING

CATEGORY, SCOPE, AND AUTHORITIES		KEY DATES	
Policy category:	Operational	Approval:	March 18, 2024
Functional area:	Research	Effective:	March 18, 2024
Applies to:	Staff, Volunteers, Others	Revision frequency:	3 years
Approval Authority:	Leadership Team	Last review:	N/A
Executive Champion:	CEO	Next review:	2027

I. RATIONALE

Ovarian Cancer Canada (OCC) is committed to upholding the highest standards of research integrity and security. This policy is established in response to the Government of Canada's [Policy on Sensitive Technology Research and Affiliations of Concern](#) which aims to safeguard against high-risk collaborations, particularly with military and state security-related institutions.

Sensitive Technology Research Areas are advanced and emerging technologies that are important to Canadian research and development, but may also be of interest to foreign state, state-sponsored, and non-state actors, seeking to misappropriate Canada's technological advantages to our detriment. These technologies are identified on [Government of Canada's list of Sensitive Technology Research Areas](#).

The Government of Canada communicated that, starting in 2024, federal research grants and funding applications that focus on sensitive technology areas will be denied funding if any researchers involved receive support or have affiliations with entities linked to military, defense, or state security that may threaten Canada's national security.

II. OBJECTIVE

The policy ensures all OCC research activities which receive full or partial federal research funding comply with the Government of Canada's guidelines about the integrity and security of sensitive technology research. This includes diligence in identifying sensitive technology research areas, scrutinizing researcher affiliations, and adhering to attestation and validation requirements in grant applications.

III. SCOPE

This policy applies to:

- **OCC research grants and funding applications that are funded entirely or partially by federal granting councils or the Canada Foundation for Innovation.** This includes all

forms of support directed towards research projects under the banner of OCC Federally Funded Research.

- All individuals participating in OCC Federally Funded Research, such as researchers, staff, collaborators, and Highly Qualified Personnel¹ (HQP). The term "Research Team" refers collectively to these participants.
- **All phases involved in the research process.** This encompasses the initial proposal submission, ongoing research activities, and the final dissemination of research findings for any OCC Federally Funded Research.

IV. POLICY DETAILS

1. Ovarian Cancer Research and Sensitive Technology Research Areas

OCC's research falls under "[Life Science Technology](#)" and potentially other areas identified in the [Sensitive Technology Research Areas](#) list of technologies critical to Canadian research.

2. No affiliation or support

To be eligible for federally funded OCC research grants, Research Teams must not have current affiliations or receive support from entities connected to military, national defence, or state security listed in the Government of Canada's [Named Research Organizations](#).

3. Compliance Requirements

In order to be eligible for funding, all applicants for OCC research grants or funding application that are funded in part or in full by the federal government must demonstrate compliance with the following:

3.1. Identify Sensitive Technology Research Areas:

- Principal Investigators (PIs) must determine and disclose to OCC if their research will advance any sensitive technology areas identified on the Government of Canada's [Sensitive Technology Research Areas](#) list.
- If one project in a multi project grant advances a sensitive area, the entire grant must comply with this policy.
- If the research does not advance any sensitive technology areas, no further action is required.

3.2. Affiliation Checks:

- If the proposed research advances sensitive technology areas, each member of the Research Team must attest that they have no affiliations or receive no funding/support from any institution listed in the Government of Canada's [Named Research Organizations](#). Affiliations must be current; past affiliations do not apply.
- In order to be eligible for funding, Research Team members must terminate all current affiliations before submitting a funding application or be removed from the application.

¹ Refer to Definitions section at the end of this document

3.3. Attestation and Compliance:

- Named researchers (e.g., applicants, co-applicants, collaborators, co-directors or equivalent roles) in [sensitive research areas](#) must provide an attestation at the application stage that they are in compliance with this policy.
- All new and existing Research Team members, including HQP, must comply with the policy throughout the project.
- New Research Team members must terminate any affiliations with named organizations before joining the project.

3.4. Validation:

- OCC will monitor policy adherence throughout the research lifecycle.
- Research projects may be periodically validated for compliance, either after funding has been awarded or before funding decisions are made.
- OCC will conduct internal audits and collaborate with federal agencies for compliance validation post-award.

4. Consequences of Non-Compliance:

Non-compliance may lead to disciplinary actions, including research grant termination, fund reimbursement, and future funding ineligibility.

V. RELATED DOCUMENTS

The following internal and external documents support the application of this policy:

- a. Procedures, forms, guidelines, and other resources:
 - Sensitive technology research area checklist, declaration and attestation form
- b. Applicable legislation and regulations:
 - [Policy on Sensitive Technology Research and Affiliations of Concern \(STRAC\)](#)
 - [Sensitive Technology Research Areas \(STRA\) list](#)
 - [Named Research Organizations \(NRO\) list](#)

DEFINITIONS

Leadership Team (LT): The most senior level of staff leadership within OCC comprised of the Chief Executive Officer (CEO), VP Finance and Administration, VP Marketing, Communications and Development, and VP Policy and Programs. The CEO may alter the composition of the LT as required from time to time. One person may hold more than one position. Titles may change at the discretion of the LT or the Board.

Executive Champion: A member of the LT with overall responsibility for an assigned policy including: drafting, carrying out appropriate consultations / assessment, evaluating implications of the policy including risks and costs and seeking legal advice where necessary, developing and

carrying out the communication, change management and implementation plan, writing any related procedures, standards or guidelines, monitoring compliance through regular reviews of the policy and reporting to the approval authority on compliance with the policy. The Executive Champion may designate a delegate, who must be named.

Activities supported by the grant: Any contribution to research related to the funded grant and throughout the lifecycle of the research project(s), up to and including the dissemination of research results (e.g., publications).

Funding and in-kind support: Monetary or non-monetary contributions, that include but are not limited to goods, equipment, materials and supplies, professional services, use of facilities (office space, lab access), software, technologies and databases.

Researcher: Any person conducting research activities. Researchers can hold different roles, including but not limited to applicants, co-applicants, collaborators, and highly qualified personnel (HQP). HQP can include undergraduate and graduate students, post-doctoral fellows, as well as research staff.

Highly qualified personnel (HQP): HQP can include undergraduate and graduate students, post-doctoral fellows, as well as research staff.

POLICY HISTORY

Include a record of all changes to the policy and their approval dates.

Date	Type of review	Comments
March18, 2024	Policy development and approval	Developed to meet the requirements of the Strategic Science Fund Grant