

Overview of the policy on Conflict of Interest and Outside Professional Activities

"Involvement in outside professional activities, both public and private, often serves not only the participant but the Institution and the field of ocean sciences as well. This policy is to ensure that an individual's activities are in concert with the interests and mission of the Institution and that the Institution has sufficient information to arrive at a reasonable decision as to the appropriateness of activities."

- Concerns include Conflict of Interest, Commitment, and Misrepresentation.
- Thus, some activities require ADVANCE DISCLOSURE and APPROVAL.
- The Advance Disclosure can be submitted at ANY TIME during the year, but must allow sufficient time for the approval process before the activity begins.
- If a person is involved in "on-going" activities, the approval for the activity must be reconfirmed each January.
- Individuals are to make disclosures to their Department Manager or Chair. If approved at that level, they are submitted to the appropriate Associate Director. If appropriate the request for approval may be passed up to the Director or Board of Trustees.

"In addition to prior disclosure of potential outside professional activities, it is in the interest of the Institution that it have a record of all such activities. Accordingly, all individuals are required to report annually on all of their outside professional activities and to disclose significant financial interest in entities that would be affected by funded research."

- Everyone must submit a yearly report, whether or not they have had outside professional activities.
- In addition, the yearly report collects required financial disclosures so that we are in compliance with government requirements regarding conflict of interest.
- Reports are submitted to Department Manager or Chair, then passed to appropriate Associate Director. These are reviewed at higher and higher levels depending upon the nature and extent of the disclosures.

"This policy applies equally to Institution personnel at all levels, defined as Trustees, members of the Administration, Scientific and Technical Staff, and all other employees, scholars, fellows, students, and others holding Institution appointments"

- A list of all "persons" at WHOI in December will be provided to each department and to the appropriate Associate Director.
- Every person on the list must submit a "Report of Individual Outside Professional and Commercial Activities" for the prior year to his/her Department Manager or Chair by February 1.
- Department Managers and Chairs are responsible for collecting the reports or informing the appropriate Associate Director if a person leaves WHOI before February 1.

What should be reported?

Outside Professional and Commercial Activities

- "Significant" use of Institution facilities, equipment, or personnel for outside activities.
- Activities that total an aggregate of more than **80 hours** in a calendar year.
- Acceptance of compensation or perquisites if the amount received cannot be clearly identified as equal to the value of the service provided.

- Service that involves remuneration, other than travel and incidental expense, from any foundation, agency, or individual from which the Institution currently receives or has received grants or other support, or with which the Institution has signed agreements or understandings.
- Service that benefits, directly or indirectly, an organization or individual to which the individual or a close relative is indebted or obligated, or in which the individual or a close relative is a partner, director, officer, employee, or share owner, or has other beneficial or creditor interest.
- Report if the work is “akin to work at WHOI”.

Financial Disclosure

- Includes Employee and his/her spouse, and/or children
- Includes Organizations that do business with WHOI
- Report if Owner, Director, Partner, Corporator, or Trustee
- Report if **Significant** shareholder – more than 5% of stock or equity position exceeding \$10,000 fair market value
- Report if received aggregate income greater than \$10,000 from the organization
- Report if was an Employee.