

# Policies Relating to Research and Other Professional Activities Within and Outside the University\*

[\\*Footnotes](#)

## **Policy Statement**

1. With the acceptance of a full-time appointment in the Faculty of Arts and Sciences (FAS), an individual makes a commitment to the University that is understood to be full-time in the most inclusive sense. Every member is expected to accord the University his or her primary professional loyalty, and to arrange outside obligations, financial interests, and activities so as not to conflict or interfere with this overriding commitment to the University.
2. At the same time, no one benefits from undue interference with the legitimate external activities of officers of instruction who fulfill their primary full-time duties – teaching at the University, conducting scholarly research under its sponsorship, and meeting the other obligations to students and colleagues that faculty must share. Indeed, the involvement of faculty members in outside professional activities, both public and private, often serves not only the participants but the University as a whole. Recognizing its inability to construct detailed rules and codes of ethics that strike the proper balance in all cases, the Faculty has chosen instead to enunciate broad guidelines on conflicts of interest and commitment and to place the onus of seeking advice on issues that might reasonably appear to pose significant conflicts on individual members. It has been, and continues to be, assumed that all faculty members will be alert to the possible effects of outside activities on the objectivity of their decisions, their obligations to the University, and the University's responsibilities to others.
3. The areas of potential conflict may be divided into two broad categories. The first relates to conventional *conflicts of interest*. These include situations in which members may have opportunities: (i) to influence the University's business decisions in ways that could lead to personal gain or give improper advantage to their associates; or (ii) to design or modify their research and teaching activities in ways that significantly and inappropriately benefit their external activities and personal finances. The second is concerned with *conflicts of commitment* – situations in which members' external activities, often valuable in themselves, interfere or appear to interfere with their paramount obligations to students, colleagues, and the University. Teachers and scholars are given great freedom in scheduling their activities with the understanding that their external activities will enhance the quality of their direct contributions to the University. The University also stipulates that full-time appointees may neither teach for other educational institutions or organizations nor hold research appointments at other academic organizations without the approval of their Deans and others. These

requirements are specified in greater detail in the [Statement on Outside Activities of Holders of Academic Appointments](#).

4. The Office for Faculty Affairs shall advise the Dean and individual faculty members on problems involving conflicts of commitment.
5. It is assumed that minor conflicts will still be resolved primarily through individual discretion or informal administrative adjustment. It is also recognized that adequate protection for the University will frequently be derived through the traditional academic practices of scholarly publication and public disclosure of author and sponsor. However, if a member is engaged in an outside activity or has significant financial interests (personally or in association with members of his or her household or colleagues) that could reasonably appear to present significant conflict, he or she must disclose this possibility to the relevant dean(s). In addition, the member must include these interests in the financial conflicts of interest disclosure submission in accordance with the [FAS Policy on Financial Conflicts of Interest \(fCOI\) Disclosures](#) and, if it is deemed necessary after consultation, modify his or her activities appropriately. Whenever members have any doubts about whether an activity may involve a conflict of interest or commitment they are expected to seek such consultation. Examples of activities and situations that should be discussed or disclosed are provided in the next section. Leaving primary responsibility for initiating consultation and making borderline judgments with individuals conforms with collegial traditions but exposes colleagues and the institution to substantial risk. Accordingly, the Edgerley Family Dean of the FAS may impose sanctions if individuals have seriously violated these guidelines.

## Examples of Activities

The following list includes examples of activities and situations that may present conflicts of interest or commitment.

1. ACTIVITIES WHICH ARE USUALLY PERMISSIBLE WITHOUT CONSULTATION WITH THE RELEVANT DEAN(S), BUT FOR WHICH DISCLOSURE AND REVIEW MAY BE REQUIRED IN ACCORDANCE WITH THE [FAS FINANCIAL CONFLICTS OF INTEREST POLICY](#):
  - Salary or any other remuneration (including consulting fees, honoraria, paid authorship, or other compensation) received from an entity other than Harvard University.
  - Service as a consultant to outside organizations, provided that the time and energy devoted to the task is not excessive and the arrangement in no way inhibits publication of research results obtained within the University. The University recommends that faculty use the [Addendum to Consulting Agreement](#) when entering into consulting agreements as a means of assuring that the consulting activity will not conflict with the faculty member's obligations under the [University Intellectual Property](#)

[Policy](#). Paid consulting for other educational institutions or educational organizations requires prior approval by the relevant dean(s).

- Service on the boards and committees of organizations so long as it does not distract unduly from University obligations.

2. ACTIVITIES THAT SHOULD BE DISCUSSED WITH THE RELEVANT DEAN(S) EVEN THOUGH NO IRRECONCILABLE CONFLICT OF INTEREST OR COMMITMENT IS LIKELY TO BE INVOLVED:

- Relationships that might enable a member to influence Harvard's dealings with an outside organization in ways leading to personal gain or to improper advantage for anyone. For example, a member could have a financial interest in an enterprise with which the University does business and be in a position to influence relevant business decisions. Ordinarily, such problems can be resolved by full disclosure and by making arrangements that clearly exclude that member from participating in the decisions.
- Situations in which the time or creative energy a member devotes to extramural activities appears large enough to compromise the amount or quality of his or her participation in the instructional, scholarly, and administrative work of the University itself. The guideline applicable to faculty members, as defined in the [Statement on Outside Activities of Holders of Academic Appointments](#), is that during the academic year (which extends through the summer for those who receive supplemental summer salary) no more than 20% of one's total professional effort may be directed to outside work.
- Activities (research projects, conferences, teaching programs, consulting agreements, etc.) that faculty members wish to undertake on an individual basis: (a) that involve or might reasonably be perceived to involve the institution, however slightly, and (b) that violate or might reasonably be perceived to violate any of the [Principles Governing Research at Harvard](#) insofar as these principles are relevant to individual behavior.
- Situations in which a member directs students into a research area from which the member hopes to realize financial gain. The difficulty, in such circumstances, of making an objective independent judgment about the student's scholarly best interest, is obvious.

3. ACTIVITIES THAT SEEM LIKELY TO PRESENT AN UNACCEPTABLE CONFLICT OF INTEREST OR COMMITMENT AND MUST BE DISCUSSED WITH THE RELEVANT DEAN(S):

- Situations in which the individual assumes executive responsibilities for an outside organization that might seriously divert his or her attention from University duties or create other conflicts of loyalty. (Individuals must consult the relevant dean(s) before accepting any outside management position.)
- Use for personal profit of unpublished information emanating from University research or other confidential University sources, or assisting

an outside organization by giving it exclusive access to such information; or consulting under arrangements that impose obligations that conflict with the [University Intellectual Property Policy](#) or with the institution's obligations to research sponsors.

- Circumstances in which a substantial body of research that could and ordinarily would be carried on within the University is conducted elsewhere to the disadvantage of the University and its legitimate interests.
- Any activity (research project, conference, teaching program, consulting agreement, etc.) that a faculty member may wish to undertake on an individual basis: (a) that involves or appears to involve the institution significantly (for example, through the use of its resources or facilities, or the participation of colleagues, students, and staff, etc.); and (b) that violates any of the [Principles Governing Research at Harvard](#) insofar as these principles are relevant to individual behavior. In particular, members may not give other organizations the right to censor research any part of which is performed under University auspices.

## **REFERENCES**

[Statement on Outside Activities of Holders of Academic Appointments](#)  
[University Policy on Individual Financial Conflicts of Interest for Persons Holding Faculty and Teaching Appointments](#)  
[FAS Financial Conflicts of Interest \(fCOI\) Policy](#)  
[FAS Principles Governing Research at Harvard](#)  
[University Intellectual Property Policy](#)  
[Addendum to Consulting Agreement](#)

\*As voted by the President and Fellows of Harvard College March 1, 1982, amended on July 25, 1987, and as subsequently amended by votes of the Faculty of Arts and Sciences on October 29, 1987 and May 2, 1995, as amended by vote of the Faculty Council on November 15, 2000, and as amended on May 18, 2017.

Emendations from May 18, 2017 are the result of consultations among the FAS Committee on Research Policy (CRP), the Dean for Faculty Affairs and Planning, and the Edgerley Family Dean of the Faculty of Arts and Sciences.