

Kenyon College

Policy on Conflict of Interest and Ethical Conduct

Kenyon College respects the privacy of every trustee, administrative officer, member of the faculty, and employee in the conduct of his or her personal affairs. Nevertheless, institutions should take reasonable precautions against conflicts of interest.

A conflict of interest would be deemed to exist if a trustee, officer, member of the faculty, employee or spouse or dependant children of any of the above, as a result of his or her position at the College, would derive directly or indirectly, personal benefit, financial or otherwise, through dealings with, or employment by others with which the College has professional, financial, or business relationships, except where such dealings or employment are in the best interest of the College and/or have been expressly approved by the trustees or the president of the College.

A conflict of interest or potential conflict of interest would also exist if anyone applying for Federal funding (i.e. grant proposals) would have significant financial interests that would appear to be directly and significantly affected by the research or educational activities funded or proposed for funding to a Federal agency. The term 'significant financial interest' means anything of monetary value, including but not limited to, salary or other payments for services (e.g., consulting fees or honoraria); equity interests (e.g., patents, copyrights and royalties from such rights.)

Standards of ethical conduct preclude unauthorized disclosure of confidential information and/or using College time or facilities for personal purposes or other activities from which a personal benefit is derived.

In order to fulfill the Board's responsibilities in regard to the policy, the secretary shall send to each trustee and officer, before the October meeting of the Board, a statement of this policy with the request that the following letter be completed, signed, and returned to the secretary. The president shall do the same for each of the senior administrative officers of the College, and for any other faculty or staff member who is in a sensitive position as regards conflict of interest and/or ethical conduct and give a full report on this matter to the Board upon request by the chairman. The financial officer of the College shall do the same for any faculty member or employee applying for Federal funding (i.e. grant proposals.) If any actual or potential conflict of interest is discovered by the financial officer, the grant proposal will not be approved for submission until such conflicts or potential conflicts are resolved. If a conflict of interest is discovered after a grant proposal has been submitted and approved, the College may require divestiture of significant financial interests and/or severance of relationships that create actual or potential conflicts. The financial officer shall require the above-referenced statement to be completed at the time the grant proposal is submitted and will update the disclosures during the pendency of the award as new reportable significant financial interests are obtained. It is the responsibility of the employee submitting the proposal and or receiving funding to notify the financial officer of the College of any such changes requiring disclosure.