

Declaration of Outside Activities

CBS welcomes that faculty members collaborate with businesses and organisations. This includes both research collaborations and activities that are not directly research-related, such as consulting relationships and board memberships.

While valuable when pursued responsibly, such activities may lead to conflicts of interest (COIs) in research, teaching, dissemination and participation in the public debate. Therefore, such activities should be declared publicly to allow others to evaluate whether possible biases might exist. Senior Management has thus decided that *all faculty members at CBS must publicly declare any paid outside activities (bibeskæftigelse) on their CBS homepage.*

Rules and regulations

Declaration of paid outside activities is in line with the Danish Code of Conduct for Research Integrity (the Code), which highlights transparency as one of the three basic principles that should pervade all phases of research (the other two being honesty and accountability).

As part of the Code's description of transparency, it stresses openness concerning conflicts of interest. The Code defines conflict of interest (COI) as follows:

"A conflict of interest is a situation in which financial or other interests have potential to compromise or bias professional judgement."

The Code is concerned with research. However, as noted above, COI can appear not only in research, but also in other key activities such as teaching, research dissemination and participation in the public debate. Here it is useful to distinguish between actual and apparent COI. The definition above is of actual COI. By contrast, an apparent COI is a situation in which a reasonable person could think that an actual COI exists. To counteract suspicion by the public of any biases, not only actual, but also apparent COIs must be addressed, e.g. transparency requirements must be broad and cover all paid outside activities.

CBS has asked the Legal Advisor to the Danish Government (Kammeradvokaten) whether it is possible to require that such information is made publicly available. Kammeradvokaten finds that CBS can change the guidelines regarding paid outside activities in order to require public declaration of these (type of occupation and name of employer) within rules governing data protection etc.

This document only concerns the declaration of paid outside activities. The rules governing other aspects are described in the General Consultation Committee's (HSU) guideline on outside activities.

Declaration requirements for paid outside activities

1. Faculty members must declare paid outside activities on their CBS homepage. The exceptions are 1) employment that is encompassed in the description of "faglig bibeskæftigelse" in the General Consultation Committee's guidelines, and 2) employment with a total compensation with a value of less than 5,000 DKK.
2. The transparency requirement applies to compensated activities irrespective of the existence of any formal employment contract.
3. The requirements apply to all faculty members with primary employment at CBS, including faculty members formally in administrative positions such as heads of department, deans and president. CBS is always considered to be the primary employer if the faculty member is

employed at least 50% of a full-time position. In addition, CBS is considered the primary employer if the faculty member does not have any other employment exceeding that of CBS measured as a fraction of a full-time position. Faculty members for whom CBS is not the primary employer are strongly encouraged, but not required, to follow the declaration rules.

4. Information on paid outside activities must include the following:
 - a. Name of the contractual partner. This must be the organisation that receives the benefit of the work performed, not an intermediary. If the contractual partner is an individual citizen, he or she will be presented on CBS.dk as “individual citizen” or similar (i.e. name not made public).
 - b. The year(s) during which the activity took place.
 - c. The type of activity. This can be stated in broad terms such as legal advice, investment advice, or board directorship.
5. The list must include activities for the past 5 years. However, initially, faculty members are only required to include activities occurring since 1 January 2018, so that the 5-year window takes effect on 1 January 2023. When feasible, faculty members are encouraged to also initially apply the 5-year window.
6. New faculty members are only required to list ongoing or new activities taking place when affiliated with CBS.
7. The list must be updated at least every 6 months in case of new activities.
8. In some cases, it may not be possible to declare the information mentioned in article 4, e.g. in legal cases where a client’s identity may be protected generally by confidentiality. If a relationship requires confidentiality, the faculty member must inform the head of department in writing of the name of the organisation (intermediate organisation in cases of client confidentiality regarding individual citizens), explain why confidentiality is required, and identify any potential COIs. If the head of department approves, the faculty member can then omit the name of the contractual partner when declaring the activity on the homepage, and instead declare the identity of the intermediary (e.g. a lawyer or an auditor). In extraordinary cases, it may be necessary not to mention paid outside activities on CBS.dk. In such cases, the dean of research must approve such confidentiality.
9. If a member of faculty is granted exemption from the requirement to declare the identity of the employer based on proportionality as per above, the faculty member should abstain from publishing any research dealing with matters directly related to the outside activity.
10. It is the responsibility of the individual faculty member to ensure that the information declared conforms to the requirements stated above. Departments will support the process of keeping information updated by setting up internal procedures.

In case questions concerning the above rules are encountered, researchers are advised to contact their respective head of department.

Note that the above rules of declaration at CBS.dk supplement existing declaration principles, e.g. in journal articles.

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