



Centre for Economic
Policy Research

Research Excellence, Policy Relevance

Centre for Economic Policy Research
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Conflict of Interest Policy for all researchers affiliated to the Centre for Economic Policy Research (hereinafter “the Centre” or “CEPR”)

This policy applies to all researchers participating in any event or externally-funded research activities through their affiliation to any of CEPR’s Programmes as a Fellow or Affiliate. It applies equally to all Programme Directors, Research Director and Policy Director in the performance of their duties on behalf of CEPR.

The purpose of this policy

Conflicts of interests may arise where an individual (researcher)’s personal or family interests and/or loyalties conflict with those of the Centre and any of the activities it is involved in. Furthermore, they may occur when their own (private) interests diverge with professional obligations to the Centre in a way that might lead an external funder, collaborator or observer to call into question whether the individual’s professional actions or decisions are determined by personal gain, be this financial in nature or otherwise. CEPR engages contractually or in a more collaborative manner with government agencies, external funders or other institutions to carry out research or research-related activities and events and by whose regulations and policies CEPR must abide to ensure confidence in the integrity and impartiality of its research is maintained to the levels expected of it.

Such conflicts may create problems; they can:

- Inhibit free discussion;
- Result in decisions or actions that are not in the interests of the Centre; and
- Risk the impression that the Centre has acted improperly; and
- Could result in the loss or repayment of any funding.

The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety.

The declaration of interests

Accordingly, we require any researchers participating in an externally-funded project for which the Centre is a contracting party to declare their interests, and any gifts or hospitality received in connection with performing all research-related activities including those undertaken by the researcher for externally-funded projects under the auspices of the Centre and its activities. This declaration (using the Centre’s own template) shall be provided as soon as the researcher(s) agree to take on the responsibility of either leading or participating in an externally-funded project. (Hospitality in this case refers only to that which is offered in

addition to the standard hospitality e.g. accommodation, food and refreshments offered to all participants in an activity or an event in which CEPR is involved and which is necessary for the participation of the researcher in the activity.) Where a researcher is involved in a successful proposal being negotiated with an external agency or collaborator as a CEPR-affiliated researcher, they will be expected prior to the conclusion of the contract negotiations to disclose fully any financial or research interest that may be considered a conflict of interest, including any related to the design, submission or their conduct and implementation of any successful externally-funded research project or activity. A declaration of interests form is provided for this purpose, listing the types of interest you should declare.

If you are not sure what to declare, or whether/when your declaration needs to be updated, please err on the side of caution. If you would like to discuss this issue, please contact the Programme Director of the programme area to which you are affiliated in the first instance, for confidential guidance. They may then discuss any such further with the Research Director. Interests will be recorded on the Centre's register of interests, which will be maintained by Dr Tessa Ogden as Centre CEO, who will also be responsible for ensuring this register will be accessible to any interested parties.

Conflicts of interest can exist where a CEPR research fellow or affiliate has an external (economic) interest or is engaged in activities that will affect or provide an incentive to affect activities they carry out where the Centre is a contracting party. These can arise simply through the individual researcher's activities as an employee of a university, research organisation or in the private sector, which does not imply any wrongdoing on their part. CEPR must, however, preserve its independent, non-partisan nature and that of its research integrity and any such conflicts may be perceived to be injurious to the Centre's mission.

In conducting their work, affiliated researchers can provide analyses and recommendations on policies to government officials and any elected representatives in the European Union and beyond. Affiliated researchers have a duty to the Centre to help protect its independent, non-partisan approach to research and the way it taps into policy at the national and international level within Europe. While affiliated researchers are of course free to engage in political activity as they see fit, they are therefore obliged to ensure that they do not associate CEPR with any work they conduct that may be construed as politically biased in nature.

Where a contractual arrangement is in place between the Centre and another organisation or government that funds specific research-related activities or a specific research project beyond normal membership of CEPR, this is considered research funding. In such cases, any researchers affiliated to CEPR carrying out the work on its behalf (and for which it is a contracting party) are expected to complete the 'Declaration and register of interests' form in relation to the activities or project. In addition, they will be expected to ensure that any work relating to such a contractual arrangement does not 1) hinder CEPR's general dissemination and outreach activities and 2) represent any policy stance on either a personal or institutional level.

Meetings of the Appointments Committee

Committee members will review any instances in which an affiliated researcher is (at the time of the annual appointments meeting) involved in or due to participate in research activities funded by an external party and for which the Centre is a contracting party. This information will be confirmed with the researcher in advance of these research activities being undertaken by the researcher and will be provided to the Committee by the Centre's Programmes Officer in advance of each annual review. The Committee will reserve the right to request a formal statement from any researcher who fails to provide sufficient notice of any potential conflict of interest such as those highlighted above. It may consequently decide to suspend the researcher's affiliation if the statement provided does not explain adequately how such a conflict arose and if the researcher has not taken the necessary steps to avoid it. The suspension will be valid until the committee can recommend to the Research Director that the conflict(s) of interest related to the researcher have been properly declared to the Centre and that it will not impact upon CEPR's reputation or any of its activities.

Decisions taken where a CEPR-affiliated researcher has an interest

In the event that the Research Director and the relevant Programme Director has decided that an individual researcher has an interest, they will invite the researcher to a meeting either by Skype or in person at the Centre's offices, giving at least two weeks' notice, at which they will discuss any such conflict that has come to their attention and to allow the researcher to explain how it may have arisen. The Research Director and Programme Director will provide a formal written response within a calendar month with a summary of the discussion, after which they will set out their decision on whether a conflict of interest has occurred and if it is injurious to the Centre's reputation. Any such decision will also provide the researcher with the recommendations they will provide to the Appointments Committee to manage or remove the conflict and they will invite the researcher to help minimise the impact of the conflict on the Centre's research agenda and interaction with any external parties. If they decide a conflict has arisen, they will send a written warning to the researcher to ensure they are fully apprised of the ramifications of any future conflict on their work and the Centre's relationships and collaborations with external partners. This warning will be held on the researcher's file for a minimum of three years.

All decisions under a conflict of interest will be recorded by the CEO (who will sit in on the meeting between the researcher and the Research Director and Programme Director without participating actively) and reported in the minutes of the meeting. The report will record:

- The nature and extent of the conflict;
- An outline of the discussion;
- The actions taken to manage the conflict and recommendations to be forwarded (if any) to the Appointments Committee.

Allowable exemptions

A *de minimis* exemption applies to contracts less than £5,000 in value (or equivalent thereof) for which no declaration shall be required. Random checks against the register of interest will be made on the award of contracts associated with the individual researcher and to which the Centre is a contracting party below this value. If the cumulative value of a series of small contracts exceeds £5,000, further information may be sought by the Centre if this is a requirement of any of the contracts involved.

The *de minimis* exemption does not apply to contracts of employment with the Centre; where a researcher has to be employed directly by the Centre in order to participate in an externally-funded research project or activity, the contract of employment will be terminated with immediate effect and in line with the regulations of the funder responsible for remuneration of the researcher for any time spent on the project (and which was to be reported by the Centre in order to obtain said reimbursement for the costs associated with it).

Independent external moderation will be used where conflicts cannot be resolved through the usual procedures through an independent arbitration service.

Managing contracts

Any researcher engaged by CEPR to work on an externally-funded research project or activity is required to enter into a formal contractual agreement with the Centre.

If a researcher employed directly by the Centre to work on an externally-funded research project or activity has a conflict of interest, they must not be involved in managing or monitoring that contract on behalf of the Centre in which they have an interest. Monitoring arrangements for such contracts will include provisions for an independent challenge of bills and invoices, and termination of the contract if the relationship is deemed unsatisfactory.

How this policy will be implemented

To be effective, the declaration of interests needs to be updated at least annually, and also when any changes occur.

For *Programme, Research and Policy Directors* this will be implemented by the completion of an annual 'Declaration and register of interests' form, which will be supplied by CEPR in January of each year and should be returned by 28th February subsequent to that.

For *researchers contractually engaged in CEPR projects*, this will be implemented by the completion of a declaration of interests at the start of the project based on the aforementioned form, and on an annual basis thereafter for the duration of the project.

This document shall be effective from 15th June 2016.