

# ISPC Conflict of Interest Policy

## Introduction

The remit of the Independent Science and Partnership Council (ISPC) is to provide independent scientific advice directly to the donors of the CGIAR, and indirectly to the scientific leadership of the CGIAR.

The independent scientific advice provided to the donors assists them in decisions relating to their financial support of international agricultural research for development conducted by the Centers and CGIAR Research Programs (CRPs) of the CGIAR. This financial support involves millions of US\$ every year of public money, invested by governments with the intention of delivering research outputs which will ultimately contribute to agreed development outcomes. Only the best research will be funded. Such research should be relevant involving high quality science, and undertaken effectively and efficiently. In short, it must be good value for money and have a high likelihood of leading to positive impacts on poor people in developing countries.

It is imperative, therefore, that the ISPC is, and is seen to be, independent and objective. If its independence and objectivity are compromised, the quality of its advice is reduced. Worse still, if its independence and objectivity are compromised, trust in the ISPC's advice is lost.

Conflicts of interest associated with Council members and/or staff in the Secretariat, or with consultants commissioned to provide expert advice, could compromise, or be perceived to compromise, the independence and objectivity of the ISPC. This is to be avoided at all cost.

## What is a conflict of interest?

A general legal definition of a conflict of interest is: *a set of circumstances that creates a risk that professional judgment or actions regarding a primary interest will be unduly influenced by a secondary interest*<sup>1</sup>. Expressed more simply, a conflict of interest is: *a situation that has the potential to undermine the impartiality of a person because of a clash between personal interest and professional or public interest*<sup>2</sup>. At its most basic, this could be expressed as: *a situation in which an individual has competing interests or loyalties*<sup>3</sup>.

A conflict of interest may be *actual* (it exists), *potential* (it might develop into one) or *perceived* (it may be considered to exist by others).

It is well recognized that with respect to an organization having the size and complexity of the CGIAR, it would be very difficult to completely avoid conflicts of interest if members and staff are to have sufficient awareness of how the CGIAR operates to provide relevant advice. The aim of this policy is therefore to ensure that any potential Conflicts of Interest are made open and transparent, and that processes are managed to take declared interests into account. No

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<sup>1</sup> Lo & Field (2009), *Conflict of interest in medical research, education and practice*, National Academies Press (US); originally from Thompson (1993), *Anti-discriminatory Practice*, Macmillan 179pp.

<sup>2</sup> BusinessDictionary.com (2015)

<sup>3</sup> About.com (2015)

policy can account for every eventuality; it is the responsibility of all individuals working with the ISPC to declare any unforeseen associations which could be perceived as a conflict.

### **Examples of conflict of interest**

There are many types of conflicts of interest, including personal, institutional, scientific, political or ethical. In these, an individual is compromised by their loyalty to individuals (themselves, family members, or friends), institutions (former students or colleagues), scientific interests or political allegiance.

The potential benefit or gain accrued may be obvious, such as financial reward or employment, or more subtle, such as reputational gain or access to privileged knowledge. The ‘benefit’ might also be negative, in the sense that a grievance or dislike is reflected by a negative opinion.

In the specific ISPC context, common examples of when conflicts of interest may exist include:

- Commissioning work from family members, friends, colleagues, employers, former colleagues, former employers;
- Reviewing proposals from, or including, family members, friends, colleagues, employers, former colleagues, former employers, competitors of current or former colleagues or employers;
- Considering family members, friends, and colleagues from the same employer or competitors for appointment as Council or consultants.

The appropriate time definition of ‘former’ depends on a number of factors and is given in Annex 1.

### **Recruitment and conflicts of interest**

When recruiting ISPC Council members, Secretariat staff or consultants, an important criterion to be considered is possible conflict of interest. For example, recent employment by or collaboration with a CGIAR Centre may be considered sufficient grounds for non-selection.

Annex 1 has 2 separate sections related to recruitment: A for completion by potential Council members at the time of interview and B for completion by Secretariat staff members at time of joining the Secretariat. The information in section A is requested for the benefit of the Selection and Nomination Committee for Council members in the first instance, but if recruitment is successful also for the ISPC Secretariat register of Conflicts of Interest. The bullets below categorize the degree of potential conflict.

Section A:

- A ‘yes’ to question 1 would disqualify an applicant (from 2016 onwards) for membership of the Council. To maintain independence, current employees of the CGIAR cannot be Council members and recent affiliation to a Center, CRP or major Center collaborator could introduce biases. A ‘yes’ to questions 2 and/or 3 still represents a significant risk of conflict of interest, but an applicant for the Council could be considered on the understanding that such conflict would have to be carefully managed. Managing such a conflict of interest may be considered worthwhile for the services of an otherwise strong candidate.

- A ‘yes’ to questions 4 or 5 would not disqualify an applicant for the Council or the Secretariat, but there may be a low risk of conflict of interest which would have to be managed.

## **Section B**

It is not considered that any of the potential conflicts should disqualify potential recruits to the Secretariat. The aim of asking for completion of this declaration is to enable the Executive Director to manage the conflicts with respect to the allocation of tasks between Secretariat staff.

## **Proposal Assessment and Conflicts of Interest**

A wider range of conflicts needs to be considered at the time of assessing proposals due to the large number of partners which may be involved in CRPs. Care needs to be taken in particular to ensure that assessors do not have institutional conflicts, given the large number of partners involved in CRPs. Attempts will be made to identify all conflicts described in Annex 1 C prior to allocation of assessments tasks, but given the number of pages and the number of individual scientists involved in each CRP it will not always be possible to spot potential conflicts in advance. If this is the case then it is unlikely that a conflict is significant, but it should be recorded nonetheless.

## **Section C**

- With respect to question 1: declaration of employment by a partner which is proposed to receive funds from a specific CRP would exclude a Council member (or expert consultant) from assessing the relevant aspect of that proposal and for the Council member from the discussion on scoring that CRP as a whole.
- With respect to question 2: declaration that a family member or associate with whom the Council member, Secretariat staff or consultant has financial ties would exclude that individual from assessing the relevant aspect of that proposal and for the Council or staff member from the discussion on scoring that CRP as a whole.
- Where a CRP is known in advance to be incorporating aspects of published research (question 3) by a Council member, Secretariat staff or consultant, this should be declared and detail provided to allow the Chair and Executive Director decide whether the individual is likely to benefit in any way and if so they should not participate in assessing the relevant aspect of that proposal.
- It will often not be possible to know in advance if a conflict with respect to question 4 exists and action should be taken as for the response to question 3.
- With respect to question 5 this is also unlikely to be known in advance but should be declared if the student has graduated within the last 5 years.

## **Managing conflicts of interest**

With so many opportunities, it is inevitable that some conflicts of interest will occur with ISPC Council members and Secretariat staff. Provided that these are handled transparently and managed appropriately, it should not be a problem.

Conflicts of interest must be identified, declared, recorded and managed.

- (i) **Identification of conflicts of interest.** The onus is on individual Council members, staff and consultants to identify actual, potential or perceived conflicts of interest, since only they have they detailed knowledge to do so. Council members and staff should always be on the alert for any possibility of conflict of interest, particularly potential or perceived conflicts, which may not always be immediately obvious.
- (ii) **Declaring conflicts of interest.** Once a conflict of interest is identified, to ensure transparency, it must be declared as soon as possible by the individuals concerned by bringing it to the attention of the ISPC Chair and the Executive Director of the ISPC Secretariat.
- (iii) **Recording conflicts of interest.** Conflicts of interest should be recorded on the appropriate pro forma and filed by the ISPC Secretariat. This will provide a permanent record should any complaints or appeals arise in the future. The opportunity to update these should always be provided immediately prior to assessments of pre-proposals and proposals.
- (iv) **Managing conflicts of interest.** Having identified a conflict of interest, it must be managed appropriately. The conflict of interest should be discussed with the ISPC Chair and Executive Director, and agreement reached on the most appropriate way to manage it. Several options exist, including:
  - If the risk is considered to be low, and the input of the relevant Council or staff member is required for other reasons (perhaps for their particular expertise or experience), then the Council or staff member could proceed as usual, the Chair having noted the possible (low risk) conflict of interest.
  - In some situations, it may be deemed appropriate for the Council or staff member to proceed with other related work (such as assessing other proposals), but to be recused from comment on the work with the conflict of interest.
  - For a high-risk conflict of interest, the safest approach is to recuse the Council or staff member from all work related to the conflict of interest, including other linked work. For example, if a conflict of interest has been declared with one applicant for a grant, the Council or staff member should not be involved in assessing that proposal, or any competing proposals.

The agreed management of the conflict of interest should be included in the pro forma held by the ISPC Secretariat. Staff members recruited directly from Centers or CRPs should not be involved in assessment of proposals from those Centers/CRPs for at least 2 years.

## **ISPC procedures for managing conflicts of interest**

### **Recruitment**

After being selected for interview for ISPC membership, interviewees should be asked to complete the appropriate section of Annex 1 and to declare any additional conflicts not covered by the stated questions, so that any potential conflicts can be explored during interview. On joining the Council, copies of the form should be passed to the ISPC Secretariat.

On joining the Secretariat, staff members should complete the appropriate section of Annex 1 the declaration should be retained by the ISPC Secretariat.

### **Ongoing**

Once appointed, Council or staff members should bring to the attention of the Chair and the Executive Director (by completing Annex 2) any new activity which they engage in which relates to any of the questions in the original Declaration (e.g. where they are invited to attend meetings by or enter into negotiations with Centers or CRPs). Each Specific Conflict of Interest Declaration (see Annex 2), will also be retained by the ISPC Secretariat.

Before the Chair and Executive Director allocate responsibilities for assessment of proposals, they should ask all those involved in the assessments to complete the Declaration in section C and consult this as per the details given in the previous section.

### **On leaving the Council or Secretariat**

If Council members or Secretariat staff or consultants enter into negotiations on employment or a joint funding activity with a CGIAR Center, CRP or other System entity for post-contract activities, prior to closing their association with the ISPC or within 12 months of their end-date, then they are expected to inform the Chair and Executive Director to consider jointly how best to manage the associated potential conflict of interests.

### **Responsibility**

The implementation of these procedures depends on the good faith of the Council or staff members, and the balanced judgment of the ISPC Chair, neither of which should be in doubt. If implemented conscientiously and transparently, they should ensure that the independence and objectivity of the ISPC, and its scientific advice, are not compromised. It is likely that as this policy is implemented additional conflicts may be identified and hence the policy should be regarded as a 'living document' which will be updated as appropriate.

# Annex One

## ISPC Conflict of Interest Statement

### A. Applicants for Council membership:

1. Are you now employed by a CGIAR Center or during the last two years, have you personally been employed as the DG or Head of research of a CGIAR Center, the Director of a CRP or the CEO/DG of a significant public research institute which is a collaborator/competitor of a CGIAR Center or served as a Board Chair or Chair of a Board Science Committee of a CGIAR Center.

Yes/No

If Yes please provide brief details:

2. During the last five years, have you personally been involved in the activities of a CGIAR Centre or a CRP, as an employee, consultant, adviser, Board or Advisory Committee member. (i.e. in receipt of financial remuneration beyond expenses)

Yes/No

If Yes please provide brief details:

3. Are you now, or during the last two years have you personally been employed by a partner organization which is either a significant collaborator with a CGIAR Center or CRP, a significant competitor for donor funding or in receipt of significant funding from a financial contributor to the CGIAR?

Yes/No

If Yes please provide brief details:

4. During the last five years, has a family member or someone with whom you have financial ties been involved in the activities of a CGIAR Centre or CRP, as an employee, consultant, adviser, Board or Advisory Committee member (i.e. in receipt of financial remuneration beyond expenses) or as a financial contributor to the CGIAR?

Yes/No

If Yes please provide brief details:

5. Please give details of any other activity, engagement or relationship with the CGIAR during the last ten years:

**Declaration:** I declare that the information provided on this statement is true and complete.

**Name:**

**Signed:**

**Date:**

## **B. For applicants to join the Secretariat:**

1. During the last five years, have you personally been involved in the activities of a CGIAR Center, CRP or partner receiving funds for a CRP, as an employee, consultant, adviser, Board or Advisory Committee member (i.e. in receipt of financial remuneration beyond expenses) or as a financial contributor to the CGIAR?

Yes/No

If Yes please provide brief details:

2. During the last five years, has a family member or someone with whom you have financial ties been involved in the activities of a CGIAR Centre, a CRP, or a partner receiving funds from a CRP as an employee, consultant, adviser, Board member?

Yes/No

If Yes please provide brief details:

3. Please give details of any other activity, engagement or relationship with the CGIAR during the last ten years:

**Declaration:** I declare that the information provided on this statement is true and complete.

**Name:**

**Signed:**

**Date:**

## **C. Declaration by all those assessing proposals**

1. Main employer and any other organization that provides you with remuneration (which may be named participants in a CRP)

Please provide details:

2. CRPs from which you know that a relative, close friend, close colleague or someone with whom you have financial ties is receiving funding or to which they are giving advice

Please provide details:

3. Any CRPs which may be incorporating any of your own current research

Please provide details:

4. Any CRPs which include researchers with whom you have active collaborations, recently published joint papers or are in regular email correspondence

Please provide details:

5. CRPs in which you know any of your past PhD students are active participants

Please provide details:

**Declaration:** I declare that the information provided on this statement is true and complete.

**Name:**

**Signed:**

**Date:**

## **Annex 2**

### **ISPC Specific Conflict of Interest Declaration**

**Name:**

**Date:**

**Summary/title of conflict of interest declared:**

**Description of conflict of interest declared:**

**Agreed action to manage conflict of interest:**

**Signed by Council or staff member:**

**Signed by ISPC Chair:**