

Guidelines on Conflict of Interest in NordForsk

1.0 Purpose

These guidelines are made to ensure that NordForsk employees, experts and members of NordForsk's governing bodies or advisory bodies, as well as any other person who performs services or work for NordForsk, remain impartial and are perceived as being without conflict of interest. Furthermore, these guidelines are designed to promote confidence in decisions made by NordForsk.

The Norwegian Public Administration Act, chapter II "*Concerning disqualification*" applies to all employees, experts and members of the governing and advisory bodies of NordForsk. These rules have been adapted to the needs of NordForsk, and are as follows:

2.0 Disqualification based on discretionary assessment

An employee, expert, or member of governing and/or advisory bodies of NordForsk shall be disqualified from preparing the basis for a decision or from making any decision in a case if there are any special circumstances which are apt to impair confidence in the individual's impartiality.

3.0 Automatic disqualification

An employee, expert or member of governing and advisory bodies of NordForsk shall automatically be disqualified from preparing the basis for a decision or from making any decision in a case if the individual

- a) is party to the case;
- b) is related by blood or by marriage to a party in direct line of ascent or descent, or collaterally as close as a sibling;
- c) is or has been married or engaged to, cohabitant with or the registered partner or a party, or is the foster parent of foster child of a party;
- d) is the guardian or agent of a party to the case or has been the guardian or agent of a party after the case began;
- e) is the head of, or holds a senior position in, or is a member of the executive board or the corporate assembly of a public or private institution that is a party to the case;
- f) is, or within the last three years has served as, the doctorate-level advisor for a party to the case;
- g) has ongoing research collaboration, or has within the last three years had research collaboration, with a party to the case;
- h) has collaborated on a publication with a party to the case during the last three years, if the nature of the collaboration was close, and the number of co-authors was less than 10.
- i) is a party to the case in direct competition with the case being processed.

4.0 Disqualification due to competition:

A key criterion in the concrete assessment of disqualification due to competition will be whether the rejection of one or a small number of competing grant applications would substantially improve the likelihood of approval of the application that is the object of the impartiality discussion, i.e. whether the member involved has any special interest in the rejection of certain other applications. The degree to which the disqualification will apply in relation to the entire group of applications must be clearly specified and decided on from case to case.

Anyone who is disqualified with respect to one application is also disqualified with respect to other applications that compete with that application. However, this only applies if the pool of applications consists of a maximum of 10 applications.

If a final decision has been made on the application to which the person's disqualification relates, and that application is therefore removed from the pool, the person may participate in the processing of the remaining applications.

Every effort should be made to assess impartiality on a discretionary basis. Such an assessment should primarily be focused on whether special circumstances exist that could impair confidence in the individual's impartiality. In other words, the crucial element is not whether there is reason to believe that an individual will act in a non-impartial manner, but whether confidence in this individual is likely to be diminished. It is based on how this will be perceived by the parties involved, as well as by the public at large, that the assessment must be carried out.

5.0 Declaration of conflict of interest and confidentiality

Whenever an individual is in a position where they have, or could reasonably be perceived to have, a conflict of interest, they must immediately disclose it. Experts, as well as members of governing and advisory bodies, are required to confirm their impartiality and commitment to confidentiality prior to participating in the assessment or decision-making process regarding applications.

6.0 Administrative proceedings

The individual employee, expert referee and member of NordForsk's governing and advisory bodies shall give notice to NordForsk of any circumstances that render or may render him/her/they disqualified due to conflict of interest.

With regards to the question of disqualification of any of the abovementioned, the decision will be determined by the Director of NordForsk. The Director may delegate this



decision to other employees at NordForsk, but not an employee directly subordinate to the individual deemed disqualified. If the Director is disqualified, the case shall be decided by a group of employees among the Senior/Special Advisors. In special circumstances the case shall be decided by the Chair of the Board of NordForsk or whom she or he delegates.

The agenda for all relevant meetings shall include a discussion of matters relating to members' impartiality. The minutes from the meeting shall indicate in brief that the question of disqualification appeared on the agenda, which issues have been discussed, and the final decisions taken.

If a member is deemed disqualified to participate in a matter, her or she shall leave the room during the preparation and completion of the relevant case(s).