



Institut de Recerca en Energia de Catalunya
Catalonia Institute for Energy Research

Internal Policy to avoid Conflict of Interests



Barcelona, 30th of July 2018

1. OBJECTIVE

This internal policy is intended to avoid potential conflict of interests between institutions or researchers participating in the proposal, execution and exploitation of R+D projects of our Institute, as well as to avoid potential conflict of interests for our senior researchers when they participate in the evaluation of proposals or projects of other institutions.

2. WHEN PERFORMING EVALUATIONS

Our senior researchers may perform evaluations of proposals or projects in relation to the competitive calls. They could perform as an international expert in any specific field. In these cases, the expert must work independently, in a personal capacity and not on behalf of our Institute. The expert shall observe the legal obligations of impartiality and confidentiality when performing his/her assignment.

2.1. With regards to the conflicts of interest.

When contracting independent experts, the Commission ensures that the expert do not have any conflicts of interest on the activity that is being asked to undertake and, in particular, any proposal or project that s/he called upon to assess.

The experienced researcher should be independent, impartial and objective, and behave professionally at all times.

The Commission will offer to sign a contract with the expert, before starting work. This contract includes a declaration that the expert must accept and will abide by the Code of Conduct. This means, amongst other things, that the experienced researcher declares that no conflict of interest exists and will inform the Commission if discovers that any such conflict arises in the course of his/her duties.

What could be considered a conflict of interests? Situations involving economic interest, political or national affinity, family or emotional ties or any other shared interest. For instance, the Commission establishes that the following situations will automatically be considered as conflict of interest:

- (a) for a proposal/prize application s/he is requested to evaluate, if s/he:
 - (i) was involved in the preparation of the proposal/prize application;
 - (ii) is a director, trustee or partner or is in any way involved in the management of an applicant (or linked third party or other third party involved in the action);
 - (iii) is employed or contracted by one of the applicants (or linked third parties, named subcontractors or other third parties involved in the action);
 - (iv) has close family ties (spouse, domestic or non-domestic partner, child, sibling, parent etc.) or other close personal relationship with the principal investigator of the proposal s/he is requested to evaluate as an additional reviewer from another panel (cross-panel or cross-domain proposal);
 - (v) has (or has had during the last five years) a scientific collaboration with the principal investigator of the proposal;

- (vi) has (or has had) a relationship of scientific rivalry or professional hostility with the principal investigator of the proposal;
- (vii) has (or has had), a mentor/mentee relationship with the principal investigator of the proposal.

In these cases, the expert must be excluded from the evaluation of the proposal/prize application concerned by default and may not take part in the consensus group.

To avoid situations of conflicts of interest, the Commission may withdraw experts from evaluation or monitoring duties if it deems that this is necessary. If the expert knowingly conceal a conflict of interest and this is discovered during his/her activities as an expert, the expert could be dismissed with immediate effect, the contract will be terminated and the measures laid down in the contract will be taken.

Hence, any senior researcher must be careful of submitting proposals for funding while working as an expert. If a researcher submit a research proposal for evaluation, s/he is not necessarily excluded from acting as an expert evaluator, provided that he/she declares it and that there is no conflict of interest. In this case, s/he will not be assigned to evaluate his/her own proposal or any proposals which may be competing with it.

2.2. With regards to confidentiality.

If the role of an expert involves handling classified information, s/he will need security clearance before entering into a contract.

The Commission publishes an annual list of experts who have worked for them, but they do not disclose who has worked on which proposals.

Before assigning a project to any expert for monitoring activities, the Commission may inform the project consortium of his/her name. The consortium may reject their choice of the expert in the interests of commercial confidentiality.

During implementation of the Contract and for five years after the date of the last payment, the expert must keep confidential all data, documents or other material (in any form) that was disclosed (in writing or orally) and that concerns the work under the Contract ('confidential information').

Unless otherwise agreed, s/he may use confidential information only to implement the Contract.

2.3. General principles to respect as an evaluator.

The general principles to take into account should be: evaluate each proposal or prize application in a confidential and fair way, in accordance with the applicable rules; perform his/her assignment to the best of his/her abilities, professional skills, knowledge and applying the highest ethical and moral standards; and follow the instructions and time-schedule given by the Commission or the Public Agency.

The expert may not delegate the assignment to another person or be replaced by another person.

If a person or entity involved in a proposal or prize application approaches him/her before or during the evaluation, s/he must immediately inform the Commission or the Public Agency. The expert may not be or become involved in any of the actions resulting from the proposal or prize application that s/he evaluated, at any stage of the procedure.

The expert must perform his/her work impartially and take all measures to prevent any situation where the impartial and objective implementation of the work is compromised for reasons involving economic interest, political or national affinity, family or emotional ties or any other shared interest ('conflict of interests').

In case of any doubt, please follow all the principles and procedures gathered in the Code of Conduct and contact REA services to clarify any arising situation that could be considered necessary to avoid or prevent.

Barcelona, 30th of July 2018.

Signed,

Jaume Marfà Sánchez
Management Director