

IRM Conflicts of Interest Policy

The IRM recognizes that an essential aspect of its credibility is its independence, both substantive and perceived.

Review circumstances

The IRM staff and IEP review conflicts of interest in four instances:

- **During hiring:** During the process of hiring researchers the IRM staff and the IEP check IRM researcher applicants with governments and other informed stakeholders. If investigation suggests that applicants for a given country include two or more equally qualified researchers, but that one has a more independent profile, the IRM will show preference to that candidate.
- **Annual declarations:** After being contracted, each researcher makes an annual declaration of interests to the IRM.
- **Change in circumstances:** Researchers are required to inform the IRM staff promptly of any new circumstances or developments that may trigger the conflicts of interest policy.
- **New information:** The IRM staff and IEP reserve the right to review, as needed, a case where previously unknown information raises questions of independence.

Conflicts of interest:

There are three categories of conflicts of interest. Each leads to a different set of potential actions by the IEP. These are *actual*, *potential*, and *perceived* conflicts of interest. Actual conflicts of interest require immediate dismissal or be a cause for ineligibility to contract, while potential and perceived conflicts of interest may require additional interventions. (See “Safeguards and Mitigations” below.) Conflicts of interest can include the following:

Actual conflicts of interest

1. An individual currently working in an official capacity or speaking on behalf of an international organization (e.g. Bretton Woods institutions, regional development banks, OECD).
2. An individual who works in an official capacity or speaks on behalf of a civil society organization represented in the global OGP steering committee or who has done so in the past year.
3. An individual who works in an official capacity or speaks on behalf of a government institution or other public autonomous entity or constitutional body in the country to be assessed.
4. An individual with direct ties of familiarity to a government employee directly involved with OGP in the country to be assessed.
5. An individual who currently carries out partisan political activities, supporting a particular candidate or political party as part of his or her regular work. This does not rule out individuals who take positions on particular legislation or regulation, or who work for organizations that take positions on issues.
6. An individual who is currently an active civil society participant in their country’s national OGP process, or who is head of an organization that actively participates in their country’s OGP process. The goal of this provision is to avoid a situation in which the national researcher is expected to assess a government-civil society deliberative process in which they are directly involved.

Potential conflicts of interest

1. An individual who has worked in an official capacity or spoke on behalf of an OGP participating government within the past year in matters relevant to OGP values.
2. An individual who has worked as a consultant to the evaluated government in a capacity directly pertaining to OGP or to the national action plan in the past year.
3. An individual who is an employee of an organization participating in the country’s national OGP process, without performing or responsibility of any OGP-related programmatic duties.
4. An individual who is an employee of an organization that actively participates in their country’s OGP process.

Perceived conflicts of interest

1. Where a third party could form the view that a researcher’s permanent job, official or professional role or private interest could improperly influence the performance of their duties. This includes situations that risks appearance of independence not included in above items.

Safeguards and Mitigations

During the process of hiring researchers, the IRM staff and the IEP check applicants with governments and other informed stakeholders, and the applicants make an initial declaration of interests.

In cases where a possible conflict triggers the policy, the IEP and IRM staff will work with the national researcher within the framework of this conflicts of interest policy to identify appropriate mitigation measures. If such mitigation measures cannot be mutually agreed, then the IRM may request the resignation of the researcher.

Actual conflicts of interest situations will be cause enough to disqualify a potential candidate from being an IRM researcher.

In cases where a *potential* or *perceived* conflicts of interest trigger the policy safeguards and mitigations include, but are not limited to:

1. Withhold use of organization branding, only using the researchers name.
2. Include a disclaimer in the report disclosing that while the researcher is an employee of the organization, the views and content of the report reflect her or his position as the IRM researcher and not the organization's view.
3. Submit a written agreement committing the potential researcher to step down form active participation in the OGP process, redistribute any OGP-related programmatic duties allocated to the potential researcher as an employee of the organization, or to refrain from adopting public statements directly related to specific action plan commitments.

Safeguards are to be entered voluntarily and will be proportional to the risk of potential or perceived conflict of interest and framed accordingly to the specific context or country case. If such mitigation measures cannot be mutually agreed, then the IRM reserves the right to withdraw from hiring process and re-post the position.