

# IRM Conflict of Interest Policy

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The IRM recognizes that an essential aspect of its credibility is its independence, both substantive and perceived. IRM staff, researchers, and IEP members will strive to avoid any conflict of interest between the interests of the IRM on the one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

### AIM OF THE POLICY

The aim of this policy is to protect the integrity and credibility of IRM's research process and assessments. This means ensuring that the independence and impartiality of IRM reports are safeguarded from actual or perceived undue influence.

### SCOPE OF THE POLICY

This policy covers conflict of interest situations as they relate to the review, research, or writing of IRM assessments, and it applies to IRM researchers, external reviewers, and IEP members.

Conflict of interest is understood to be any situation in which the personal interest or interests owed to another body, of those subject to the policy, run counter to those of the IRM. It occurs in those situations where an IRM researcher, external reviewer, or IEP member stands to gain,

directly or indirectly, through engagement in activities that may potentially adversely affect the independence, credibility, or impartiality of IRM assessments or the review process. It also occurs if that individual is engaged with an organization whose aims are incompatible with those of the IRM.

## TYPES OF CONFLICT OF INTEREST

There are three categories of conflict of interest: actual, potential, and perceived conflict of interest.

An actual conflict of interest involves a direct conflict between the researchers, external reviewers, or IEP duties and responsibilities in their IRM capacity and existing personal interests.

A perceived conflict of interest exists in situations where a reasonable person would think that a researcher's, external reviewer's, or IEP's judgment is likely to be compromised by private interests that could improperly influence the performance of their duties for IRM—whether this is in fact the case.

A potential conflict of interest involves a situation that may develop into an actual conflict of interest if the researchers, external reviewers, or IEP has or develops personal interests that could conflict with their official duties in the future.

For examples of actual, potential, and perceived conflicts of interest, see Annex 1.

## DISCLOSURE

IRM researchers, external reviewers, and IEP members will submit a conflict of interest declaration on an annual basis. The declarations will be kept in the conflict of interest repository.

The repository will be kept in a Google drive owned by IRM staff and shared with IEP members. This repository will not be publicly accessible but subject to [OGP's Information Disclosure Policy](#). The IRM will report on overall case management of conflict of interests, as needed and through the channels determined by IRM staff and IEP members.

It is the responsibility of IRM researchers, external reviewers, and IEP members to inform IRM staff promptly of any change in circumstances which may engage the Conflict of Interest Policy, as well as to share any concerns they may have that engage the Conflict of Interest Policy.

Should, in the course of a year, any conflicts of interest arise, IRM staff will share and engage the IEP Taskforce for determination.

## ETHICS TASKFORCE

The body responsible for the review of conflict of interest situations is the Ethics Taskforce of the International Experts Panel. The Taskforce is composed of up to three members of the IEP. IRM staff's role in the Taskforce is to prepare, raise, and inform discussions on the cases presented for the IEP Taskforce determination. In some cases, the IRM staff may prepare a recommendation for review and endorsement by the Taskforce.

Should the matter under consideration involve one of the members of the Taskforce, said member shall recuse themselves and another IEP member shall join the Taskforce on an ad-hoc basis.

## **CONFLICT OF INTEREST REVIEW PROCEDURE**

Once a conflict of interest situation arises, IRM staff will conduct an initial review of the circumstances to prepare and provide the Ethics Taskforce with the necessary background and contextual information to discuss the matter. IRM staff may appoint a primary contact to work with the Ethics Taskforce or delegate as capacity allows.

IRM staff can convene the Taskforce, or the Taskforce can meet as needed if a conflict of interest situation is brought to the attention of an IEP member directly. In this case the Taskforce will bring it to the attention of IRM staff and may request that IRM staff provide input.

The Ethics Taskforce shall meet at the earliest opportunity to deliberate and decide on the matter. IRM staff participate in the discussions and may also prepare a recommendation or options for consideration of the Taskforce.

An actual conflict of interest shall require immediate dismissal or be a cause for ineligibility to contract. Potential and perceived conflicts of interest may require additional interventions to safeguard IRM's interests and mitigate risks. In such an event, the Ethics Taskforce and IRM staff will work with the researcher, external reviewer, or IEP member within the framework of this policy to identify appropriate mitigation measures. If such mitigation measures cannot be mutually agreed upon, then the IRM reserves the right to withdraw from the hiring process or may recommend termination of contract. For examples of possible mitigation measures, see Annex 2.

The decision is documented in writing and kept in the conflict of interest repository managed by IRM staff and shared with IEP members. It will describe the facts of the case, the Taskforce's assessment, and the conclusion. The latter will also include any mitigating actions to be taken.

Information on the matter and the decision of the Taskforce shall be shared on a need-to-know basis and with due regard for confidentiality.

## **RECORD OF CONFLICT OF INTEREST**

All conflict-of-interest matters deliberated by the Ethics Taskforce shall be recorded in writing and kept in a conflict-of-interest repository. Access to the repository shall be limited to authorized IRM staff and IEP members. Anonymized data collected in the repository can be used for annual accountability reporting.

## **DATA PROTECTION**

The information provided will be processed in accordance with data protection principles as set out in applicable law. Data will be processed only to ensure that IEP members and appropriate staff act in the best interests of the IRM. The information provided will not be used for any other purpose.

## **POLICY REVIEW**

This policy will be reviewed by the International Experts Panel every two years or upon request of IRM staff if it becomes necessary to update the procedures or considerations for actual, potential, or perceived conflict of interests based on practice.

# Annex 1 – Examples of Conflicts of Interest

## ACTUAL CONFLICT OF INTEREST

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).

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.

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.

An individual with direct ties of familiarity to a stakeholder directly involved with the OGP process in the country to be assessed.

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.

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 CONFLICT OF INTEREST

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.

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.

An individual who is an employee of an organization participating in the country's national OGP process, without performing or having responsibility for any OGP-related programmatic duties.

An individual who is an employee of an organization that actively participates in their country's OGP process.

## PERCEIVED CONFLICT OF INTEREST

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.

## **Annex 2 – Mitigation Measures in Situations of Potential or Perceived Conflicts of Interest**

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

1. Withholding the use of organization branding, only using the researcher, external reviewer, or IEP's name.
2. Including a disclaimer in the report disclosing that while the researcher, external reviewer, or IEP is hired by the IRM, the views and content of the report reflect their position as the IRM researcher, external reviewer, or IEP and not the organization's view.
3. Submitting a written agreement committing the potential researcher, external reviewer, or IEP to step down from active participation in the OGP process, redistribute any OGP-related programmatic duties allocated to the potential researcher, external reviewer, or IEP, or to refrain from adopting public statements directly related to specific action plan commitments.

Any 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.